

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

(REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300
BURBANK, CA 91504
(818) 567-3000SURVEILLANCE AND COMPLIANCE REPORT
HAZARDOUS WASTE GENERATORS/
TRANSPORTERS/TSDFsDate of Inspection 10/22/92

CAD008383291

EPA I.D. #

Inspector's Name:

Facility Name/Address:

Mailing Address:

Ownership:

Powerline Oil Co
12354 Lakeland Rd
Santa Fe Springs
CA, 90670

* P.O. Box 2108

Same

County Los Angeles

Type of business:

Persons present:

Contact Person

Oil Refinery

Exit Review only

Ted Metros

D75C: Robert Kay, Memo Hernandez

Phone # (213) 944-6111

Powerline: Ted Metros
Joc Christman
Jodi Gardner

Samples taken?

☒ Yes (receipt attached)☐ NoPlan of Correction necessary? * ☒ Yes (Due date: 11/6/92)☐ NoDiscussions with Management: Consent for sampling, photographs, walkthrough, Record Review
granted by JUNE CHRISTMAN.

- 1) Records - Supplier Record will be reviewed
- Several additional documents Requested will be supplied
by Ted Metros

2) Walk through - See back

Facility operating under:

☒ ISD (AIKY)☐ Permit☐ Other

On this date an inspection of your facility was conducted under authority of Section 2185, California Health and Safety Code (H&SC) and Section 66272.1, Title 22, California Code of Regulations. The collection of samples or other evidence, including the taking of photographs, was done under authority of Section 66272.1, Title 22, California Code of Regulations. Specific violations of one or more Sections of the H&SC; Title 22, California Code of Regulations; or Code of Federal Regulations, Part 40 are noted above. These violations relate to the generation, storage, handling, transportation, and/or disposal of hazardous and extremely hazardous waste.

Authorized Representative of Firm*

Authorized State Agent

Name JUNE M. CHRISTMANName Guillermo "Memo" HernandezTitle Manager - Environmental EngineeringTitle Hazardous Materials SpecialistSignature JUNE CHRISTMANSignature [Signature]Date 10/22/92Date 10/22/92

* Signature of firm representative signifies receipt of copy of this form

* 2) walk through - Storage Area

A) NO H.W. SIGN

B) Several drums open/improperly closed
(Numerous)

C) Several drums with NO physical
(Numerous) properties/state.

D) Numerous drums with no ~~chemical~~ ^{Hazardous}
characteristics.

E) Numerous drums with NO
Accumulation start date

F) ONE Leaking DRUM

3) Drums in Storage area need not be
be attained as evidence pursuant to
Section Title 22 66272.1 as
Requested ON 10/16/92.

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST		1. Authorization Number H M I 1 4 2 1		HML No. 920604 To 920604		2. Page 1 of 2	
3. Requestor: Memo Hernandez Address (To Receive Results): 140511 Santa Fe Blvd, Burbank 91504-4500				4. Phone (818) 567-3024			
6. Date Sampled 10-22-92		7. Time Sampled		Hours		5. Priority <input checked="" type="checkbox"/> a. Authorized by	
9. Activity: <input checked="" type="checkbox"/> SEB <input type="checkbox"/> SMB <input type="checkbox"/> FPB <input type="checkbox"/> ATD <input type="checkbox"/> PASD <input type="checkbox"/> Other				8. Codes (fill in all applicable codes)			
10. SAMPLING LOCATION a. EPA ID No. b. Site Powerline Oil Company c. Address 12354 Lakeland Santa Fe 90670 Number Street City Zip				a. STC 3080 b. Region 3 c. TPC d. INDEX 6300 e. PCA 32005 f. SITE g. County 37			
11. SAMPLES							
a. ID	b. Collector's No.	c. Lab No.	d. Type	e. Type	f. Size	g. Field Information	
A	PR-MH-01	920604	Solid	glass		catalyst	
B	02	920605				coke	
C	03	920606				Zinc-oxide catalyst	
D	04	920607				catalyst	
E	05	920608				↓	
F	06	920609				dissicut beads	
G	07	920610				charcoal	
H	08	920611					
12. ANALYSIS REQUESTED							
a. <input type="checkbox"/> pH		f. <input type="checkbox"/> PCB		k. <input type="checkbox"/> Ext. Org (Screening)			
b. <input checked="" type="checkbox"/> Metal Scan		g. <input type="checkbox"/> VOA-H/S		i. <input type="checkbox"/> Flash Point			
c. <input checked="" type="checkbox"/> Metals (Spec) Aluminum		h. <input type="checkbox"/> VOA-8240		m. <input type="checkbox"/>			
d. <input type="checkbox"/> W.E.T.		i. <input type="checkbox"/> VOA-8260		n. <input type="checkbox"/>			
		j. <input type="checkbox"/> SVO-8270		o. <input type="checkbox"/>			
13. SUPPLEMENTAL REQUESTS						Initials Date	
14. CHAIN OF CUSTODY							
a. see original chain of custody							
b. Signature Aliana Hannon		Name/Title Terana Hannon / LA		Inclusive Dates 11/02/92			
c. Signature		Name/Title		Inclusive Dates			
d. Signature		Name/Title		Inclusive Dates			
15. SPECIAL REMARKS:							
16. ASSIGNED TO:						Date	
17. LAB REMARKS:							

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST		1. Authorization Number H M I 1 A 2 1		HML No. 920604 To 920614		2. Page 2 of 2	
3. Requestor Memo Hernandez Address (To Receive Results) 1405118 Inferno Blvd, Buena Park 92615		4. Phone 918561-024		5. Priority <input checked="" type="checkbox"/> a. Authorized by _____			
6. Date Sampled 10-22-92		7. Time Sampled _____ Hours		8. Codes (fill in all applicable codes)			
9. Activity: <input checked="" type="checkbox"/> SEB <input type="checkbox"/> SMB <input type="checkbox"/> FPB <input type="checkbox"/> ATD <input type="checkbox"/> PASD <input type="checkbox"/> Other				a. STC 3 0 8 0			
10. SAMPLING LOCATION		a. EPA ID No.		b. Region 3			
b. Site Powerline Oil Company				c. TPC			
c. Address 12354 Lakehurst Santa Fe 90670				d. INDEX 6 3 0 0			
Number Street City Zip				e. PCA 3 2 0 0 5			
				f. SITE			
				g. County 3 7			
11. SAMPLES							
a. ID	b. Collector's No.	c. Lab No.	d. Type	e. Type	f. Size	g. Field Information	
A	PL-MH-09	920612	solid	glass		2nd paint	
B	↓ ↓ 10	920613	↓	↓		Carbon-amine charcoal	
C	↓ ↓ 11	920614	↓	↓		catalyst	
D							
E							
F							
G							
H							
12. ANALYSIS REQUESTED							
a. <input type="checkbox"/> pH		f. <input type="checkbox"/> PCB		k. <input type="checkbox"/> Ext. Org (Screening)			
b. <input checked="" type="checkbox"/> Metal Scan		g. <input type="checkbox"/> VOA-H/S		i. <input type="checkbox"/> Flash Point			
c. <input checked="" type="checkbox"/> Metals (Spec) Aluminum		h. <input type="checkbox"/> VOA-8240		m. <input type="checkbox"/>			
d. <input type="checkbox"/> W.E.T.		i. <input type="checkbox"/> VOA-8260		n. <input type="checkbox"/>			
		j. <input type="checkbox"/> SVO-8270		o. <input type="checkbox"/>			
13. SUPPLEMENTAL REQUESTS							
Initials _____							
Date _____							
14. CHAIN OF CUSTODY							
a. See original chain of custody							
b. Diana Hannon		Tercia Hannon/LA		11 02 92 - / /			
Signature		Name/Title		Inclusive Dates			
Signature		Name/Title		Inclusive Dates			
Signature		Name/Title		Inclusive Dates			
Signature		Name/Title		Inclusive Dates			
15. SPECIAL REMARKS:							
16. ASSIGNED TO: _____ Date _____							
17. LAB REMARKS:							

Sample Receipt

If present, location on sample(s)

Sample Condition

Acceptable

Sample container received damaged

Samples received in improper container

Insufficient sample volume/weight for analysis

Sample Analysis Request form not received with the sample(s)

Discrepancies between the Authorization Request Form(ARF) and the Sample Analysis Request(SAR)

Discrepancies between SAR information and the samples

Sample Analysis Request not complete

Sample containers not numbered or illegibly labeled

Chain-of-custody not complete

Samples received without proper preservation

No information of sample preservation

Other (specify)

Action taken

None
Sample analyses on hold for further information
Inform sample collector of problem
Samples analyzed as received
Other(specify)

Name (Print)	Initial	Date	State if Corrected
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Teran Hannon JH 11-4-92

Supervisor's approval

HML # 920604 - 920614
rec'd from Region 3

FEDERAL		QUESTIONS? CALL 800-238-5355 TOLL FREE.		AIRBILL PACKAGE TRACKING NUMBER		5069075373			
2211M 5069075373				Date 10-29-92					
From (Your Name) Please Print RUSS CHIN				Your Phone Number (Very Important) (213) 620-3376		To (Recipient's Name) Please Print PAM SCHIRO/SAMPLE RECEIVING (510) 540-3101			
Company SOUTHERN CAL LABORATORIES				Department/Floor No.		Company DEPT. OF HEALTH SERVICES HAZARDOUS MATERIALS LABS			
Street Address 1449 N TEMPLE ST				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 700 HEINZ, STE 150					
City LOS ANGELES		State CA		ZIP Required 90026		City Berkeley,			
						State CA			
						ZIP Required 94710			
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.)						IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address			
PAYMENT 1 <input type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input checked="" type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card						City			
5 <input type="checkbox"/> Cash 6 <input type="checkbox"/> Check						State			
7 <input type="checkbox"/> Check						ZIP Required			
4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES WEIGHT YOUR DECLARED VALUE		Emp. No.			
Priority Overnight (Delivery by next business morning) 11 <input checked="" type="checkbox"/> YOUR PACKAGING 12 <input type="checkbox"/> FEDEX LETTER 13 <input type="checkbox"/> FEDEX PAK 14 <input type="checkbox"/> FEDEX BOX 15 <input type="checkbox"/> FEDEX TUBE		Standard Overnight (Delivery by next business afternoon, No Saturday delivery) 51 <input type="checkbox"/> YOUR PACKAGING 52 <input type="checkbox"/> FEDEX LETTER 53 <input type="checkbox"/> FEDEX PAK 54 <input type="checkbox"/> FEDEX BOX 55 <input type="checkbox"/> FEDEX TUBE		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (If offered) (Extra charge)		1 21/35 100/100 21/35 DIM SHIPMENT (Chargeable Weight) L x W x H 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 5 <input type="checkbox"/> Station		Date 11-2-92 17:30	
Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY		Government Overnight (Restricted for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 47 <input type="checkbox"/> GOVT PAK		Total Total Total 21/35 L x W x H		Received By: X Modan S. Gill Date/Time Received 11-2-92 17:30			
Freight Service (For packages over 150 lbs.) 70 <input checked="" type="checkbox"/> OVERNIGHT 80 <input type="checkbox"/> TWO-DAY						Federal Express Use Base Charges Declared Value Charge Other 1 Other 2 Total Charges			
1 Delivery commitment may be later in some areas. 2 Declared Value Limit \$500. 3 Call for delivery schedule.						REVISION DATE 2/92 PART #137204 FXEM 7/92 FORMAT #125 126 © 1991-92 FEDEX PRINTED IN U.S.A.			

HAZARD APPRAISAL AND RECOGNITION PLAN PRESITE VISIT FORM

SECTION A. FIELD TEAM

Prepared By: Guillermo "Memo" Hernandez
 Date: 10/21/92
 Phone: (818) 567-3021

Name	Unit/Agency	Responsibility
<u>Memo Hernandez</u>	<u>EMB</u>	<u>Lead person</u>
<u>Robert Kuroki</u>	<u>EMB</u>	<u>Lead Note-taker</u>
<u>Kathleen Yokota</u>	<u>TSSB</u>	<u>Industrial Hygiene</u>
<u>Tina Gutierrez</u>	<u>EMB</u>	<u>1st Sampler</u>
<u>Larry Stuck</u>	<u>EMB</u>	<u>1st Sampler</u>
<u>Yasser Alick</u>	<u>EMB</u>	<u>2nd Sampler</u>

SECTION B. SITE DESCRIPTION

Site Name: Powerline 01 CU
 PCA No.: _____ Project # _____ WP _____
 Address: 12351 Lakeland Rd
 City: Santa Fe Springs State: CA Zip: 90670
 Site Phone No.: (213) 944-9861

NOTE: Attach Map of Site and Directions to Hospital

Contact Person: Todd McInnis
 Type of Operation/Waste Stream (Describe): Powerline Refining
Crude oil, makes various grades of
gasoline, diesel, and aviation fuels
 Purpose of Visit (Describe): Second visit follow
up on a complaint
76.5 v.s. 15 for Drum Sampling
 Site Visit Date(s): 10-22-92

Estimated Time on Site: Hours/Day _____ Days 1
 Nearest Hospital and Address: Whittier Rehabilitation
15151 E. Jinnin Dr
 Phone No.: (213) 945-3561

SECTION C. NUMBER OF SAMPLES TO BE COLLECTED

Air	Surface Impoundment
Drums(s) <u>16 + Split</u>	Surface Water _____
Groundwater _____	Tank(s) _____
Soil/Sediment _____	Waste/Sludge _____
Sump/Pit _____	Other _____

SECTION D. POTENTIAL HAZARDS

1. Chemical Hazards	2. Physical Hazards
<input type="checkbox"/> Carcinogens _____	<input type="checkbox"/> Confined Space _____
<input checked="" type="checkbox"/> Corrosives <u>H.F.</u>	(Source: _____)
<input type="checkbox"/> Developmental Health Hazards (Teratogen) _____	<input type="checkbox"/> Heat or Cold Stress (Expected Temp.: _____ °F)
<input type="checkbox"/> Dusts _____	<input type="checkbox"/> Machinery/Construction _____
<input type="checkbox"/> Explosives _____	<input type="checkbox"/> Noise (Source/Decibels): _____
<input type="checkbox"/> Flammables _____	<input type="checkbox"/> Oxygen Deficiency _____
<input type="checkbox"/> Inorganic Vapors/Gases _____	<input type="checkbox"/> Radioactive Materials _____
<input checked="" type="checkbox"/> Metals <u>liquids containing Chromium</u>	<input type="checkbox"/> Unknown/Other _____
<input type="checkbox"/> Oxidizers _____	3. <input type="checkbox"/> Biohazards _____
<input type="checkbox"/> PCBs _____	4. <input checked="" type="checkbox"/> Other (Specify): <u>Coke, Coke Fines,</u>
<input type="checkbox"/> Pesticides _____	<u>FCC Fines (Black),</u>
<input type="checkbox"/> Reproductive Health Hazards _____	<u>Catalysts, ESP (Electric)</u>
<input type="checkbox"/> Skin Absorption _____	<u>Refractory Slag Pot, Dissolvent</u>
<input checked="" type="checkbox"/> Solvents <u>Fuel</u>	<u>Materials, Beads, Zinc Oxide</u>

(Use this space to describe hazards)

Samplers will be drawn from
known waste streams. Facility operator
shall stage and open all drums.
Samplers from shall be split in
two's for efficiency.

SECTION E. BASIC INFORMATION ON POTENTIAL HAZARDS

(Attach copies of HARP Chemical Data Sheets or other appropriate information as suggested in instructions.)

SECTION F. EXPOSURE CONTROL METHODS

☐ Engineering ☒ Administrative ☒ Work Practices

Describe: Avoid unknown waste streams, wear
proper PPE according to responsibility.
Avoid long period time of exposure.
Break into two teams, have two
new staff persons (#556) go through
Site Safety Orientation.

SECTION G. REQUIRED PERSONAL PROTECTIVE EQUIPMENT

Level of Protection: ☐ B ☒ C ☒ D (walk through) and note here
 Gloves(s): Outer = O, Inner = I
☐ Cotton/Vinyl ☐ Tyvek
☐ Silver Shield/4H ☒ Cloth Coveralls
☐ Neoprene ☒ P. E. Tyvek * 1st Sampler in
☒ Nitrile ☐ Saranex Level C with
☐ PVC/Monkey Grip ☐ PVC P.E. Tyvek
☐ Grip Glove/Kevlar ☐ Baracade/Chemtuff Inner gloves and
☐ Viton ☐ Other: SME II
 Respirator: ☒ A/P Cartridge: 6MC-14
☐ SCBA ☐ Escape (ELSA — 5 Min.)

Other Safety Gear:

☐ Binoculars ☒ Hearing Protection Plugs ☒ Muff _____
☐ Boot Covers ☐ Safety Vest _____
☒ Boots ☐ Two-Way Communication Kit _____
☒ Eye Protection ☐ Other: _____
☒ Hard Hats _____

SECTION H. SURVEY EQUIPMENT

☐ Combustible Gas/Oxygen Meter
☒ Photoionization Detector Probe: 11.7 & 10.2
☐ Organic Vapor Analyzer (OVA) ☐ TLV Sniffer
☐ Drager Tubes (Specify: _____)
☐ pH Meter/Paper ☐ WBGT Meter ☐ Noise Dosimeter
☐ Safety Vest Proposed work _____
☐ Two-Way Communication Kit rest _____
☐ Binoculars ☐ Radiation Meter (Victoreen 400)
☐ Aerosol/Particle Monitor
☒ Other (Specify: Maintain for)

SECTION I. OTHER HYGIENE AND SAFETY EQUIPMENT

Available On Site	Bring
<input type="checkbox"/>	<input type="checkbox"/> Canopy/Tarp/Umbrella
<input type="checkbox"/>	<input checked="" type="checkbox"/> Drinking Water
<input type="checkbox"/>	<input type="checkbox"/> Shower/Eye Wash
<input type="checkbox"/>	<input checked="" type="checkbox"/> Fire Extinguisher
<input type="checkbox"/>	<input checked="" type="checkbox"/> First Aid Kit
<input type="checkbox"/>	<input checked="" type="checkbox"/> Plastic Sheeting/Buckets/Bags
<input type="checkbox"/>	<input type="checkbox"/> Portable Toilets
<input type="checkbox"/>	<input type="checkbox"/> Washing Facilities

SECTION J. PERSONAL MONITORING

☐ Heart Rate ☐ Oral Temperature
 Do You Need Industrial Hygiene Monitoring? ☒ Yes ☐ No
 If Yes, What Type? ☐ Noise ☐ Air ☒ Other (Specify: personal)

SECTION K. REVIEW/APPROVAL

Kathleen S. Yokota 10/21/92
 Health and Safety Unit (Review) Date
Ray Yeaman 10-21-92
 Supervisor (Approval) Date

OCT 19 1992

POWERINE OIL COMPANY

12354 LAKELAND ROAD
SANTA FE SPRINGS, CA 90670TELEPHONE: (310) 944-6111
TELECOPY NO: (310) 944-8522

DATE: 10/19/92 TIME: _____

TO: Guillermo Hernandez

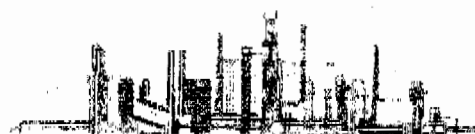
COMPANY: Dept. of Toxic Substance Control

FAX NO.: 818/567-3129

FROM: June Christman

SUBJECT: _____

MESSAGE: _____

**POWERINE Oil Company**

12354 Lakeland Road, P.O. Box 2108
Santa Fe Springs, California 90670-3857

(310) 944-9861

(310) 944-6111



TLX No: 4720404

A/B Powerine

Telecopy No: 944-8522

VIA FACSIMILE

October 19, 1992

Guillermo A. Hernandez
California Environmental Protection Agency
Department of Toxic Substances Control (DTSC)
Region 3/Facility Management Branch
1405 N. San Fernando Blvd., Suite 300
Burbank, California 91504

Subject: Review of DTSC Requests Made During Facility Inspection
on October 16, 1992

Dear Mr. Hernandez:

Per your facility inspection of October 16, 1992, we understand you need copies or other supporting verification of the following:

- 1) The Interim Status Document (ISD) Waste Analysis Plan, Closure Plan, and Closure Cost Estimate pertaining to the Alkylation Neutralization Unit (ANU);
- 2) Evidence of an agreement by a local hospital to handle Powerine emergencies including planned response to a hazardous waste emergency, particularly from the ANU;
- 3) A list of tank/container inspections excluded recyclable materials and hazardous waste, especially in the ANU;
- 4) List of emergency equipment used to respond to the release of hazardous waste and other related emergencies;
- 5) Training records for Judi Gardner and Emergency Response personnel, Bill Ingraham, John Magaña, and Craig Neighbarger. Note: a previous request for documentation of ANU operators training was rescinded;
- 6) Laboratory analysis of wastes and recyclable materials from our profile/characterization notebook marked by Ms. Kathleen Yokota;
- 7) Verification, either directly with or via USA trucking that the ultimate receiver of excluded recyclable materials, principally from California Portland Cement company is in fact

POWERINE Oil Company

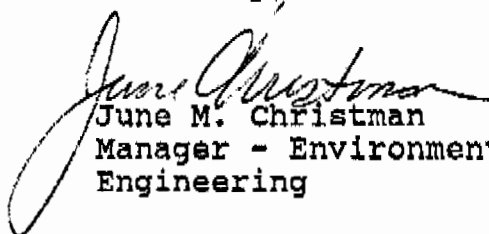
California Environmental Protection Agency
Department of Toxic Substances Control (DTSC)
October 19, 1992
Page 2

receiving the material and managing the material properly.

- 8) Waste profile breakdowns from the Laidlaw in Buttonwillow for the "waste filter" stream;
- 9) Acceptance letter from the Chemical Waste Management facility for the "facility clean up" stream;
- 10) Records of the County Department of Health Services oversight of the recent naphtha line leak on Lakeland Road;

We are now in the process of copying the regulated documentation and securing additional verification. Please contact me should you require any additional information prior to your inspection during the week of October 19, 1992.

Sincerely,



June M. Christman
Manager - Environmental
Engineering

MAW/DTSC1016.doc

cc: M. Gnagy
G. Gardner
J. Magaña
T. Metrose
M. Winefield
File

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

1405 N. SAN FERNANDO BLVD., SUITE 300
BURBANK, CA 91504

Oct 22 92

Powarne Oil Co
12354 Lakeland Rd
Santa Fe Springs CA 90670
SPLIT SAMPLE RECEIPTReceived from representatives of the Department of Toxic Substances Control on Oct 22 92
a requested sample ~~split~~ from samples acquired under the authority of Section 66272.1, Title 22,
California Code of Regulations.

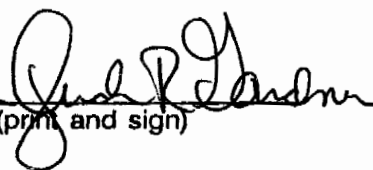

collocated

The samples are numbered as follows:

1. PR-MH-01
2. PR-MH-02
3. PR-MH-03
4. PR-MH-04
5. PR-MH-05

6. PR-MH-06
7. PR-MH-07
8. PR-MH-08
9. PR-MH-09
10. PR-MH-10

PR-MH-11

Signatures:Jodi R. Gardner 
Facility Representative (print and sign)Guillermo "Memo" Hernandez 
DTSC Representative (print and sign)

Area 8-L: Hazardous Waste Accumulation Area

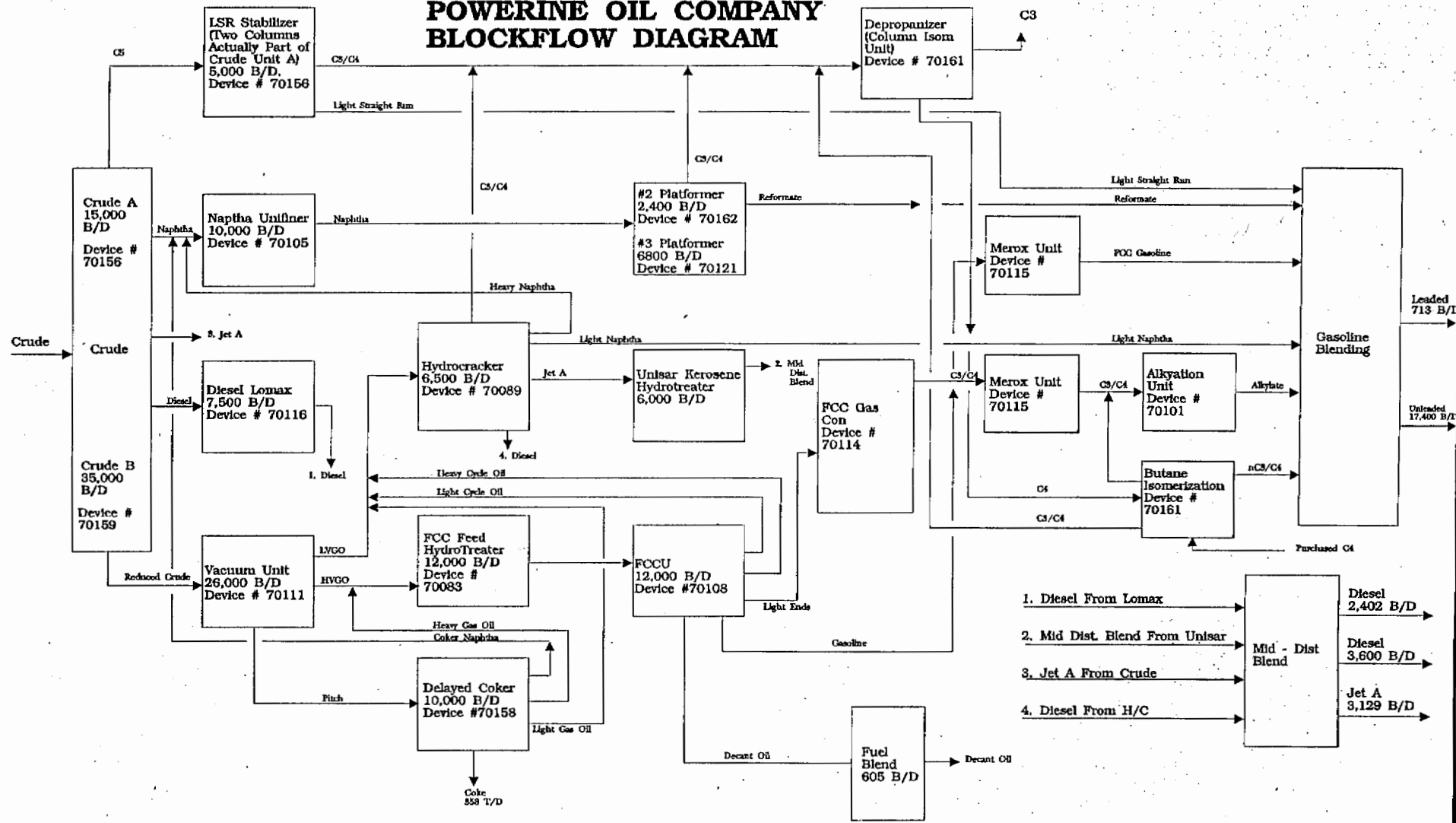
<u>EXCLUDED RECYCLABLE MATERIALS</u>	<u>Recycle Facility</u>	Character- ization if not <u>Recycled</u>	<u>Basis</u>
1 Activated Alumina Catalyst	Kiln	Non-Haz	MSDS
2 FCC Equilibrium Catalyst	Kiln	Non-Haz	TTLC
3 AKZO KF842 Unifiner Catalyst	Kiln	See 12	
4 FHT R-1 S424 Catalyst	Kiln	CA-Haz	TTLC
5 H2 HY-V-6" Catalyst	Kiln	CA-Haz	MSDS - due to Cu
6 ZINC OXIDE Catalyst	Kiln	CA-Haz	MSDS - due to Zinc
7 UCI -20 CO-moly Catalyst	Kiln	CA-Haz	TTLC
8 Coke Fines	Coker	Non-haz	MSDS
9 Dessicant	Kiln	Non-haz	STLC FP
10 Jet Clay	Kiln	RCRA-Haz	FP,TCLP,TTLC,STLC,Bio
11 Charcoal	Coker	RCRA-Haz	TTLC
12 Unifiner Cat - HR1	Kiln	CA-Haz	TTLC
13 Sand blast media	Kiln	CA-Haz	TTLC
14 Spent used oil	Slop oil	CA-Haz	Listed
15 Dimethyl disulfide	Lomax	RCRA-Haz	MSDS
16 Ethylene glycol	Refinery		Listed
<u>HAZARDOUS WASTE</u>			
	<u>Facility</u>	<u>Char</u>	<u>Basis</u>
16 Chrome Balls	Chem Wst	CA-Haz	TTLC
17 TGU Solid Wst	Chem Wst	CA-Haz	TTLC
18 Nonreusable catalyst	Chem Wst	CA-Haz	TTLC
19 Ethylene Dichloride		RCRA-Haz	Listed
23 Propylene oxide		RCRA-Haz	Listed
<u>NON HAZARDOUS WASTES</u>			
	<u>Facility</u>	<u>Char</u>	<u>Basis</u>
20 Filters		Non-Haz	FP,TCLP,Reac,STLC,PCB
21 Facility Clean up		Non-Haz	TCLP,TTLS, STLC
22 Nonreusable FCC Fines		Non-Haz	TTLC

Area 8-M: Gasoline Bulk Terminal Storage Tanks

Hazardous Material

- 1 Gasoline

POWERINE OIL COMPANY BLOCKFLOW DIAGRAM



POWERINE OIL COMPANY

MATERIAL SAFETY DATA SHEETS

LOCATION INFORMATION

Material Safety Data Sheets (MSDS) on all chemicals found in our refinery have been compiled into a six volume set of manuals. Each individual MSDS has been assigned (by chemical name) a P.O.C. number and arranged in alphabetical order in the MSDS Manuals.

NOTE: REFER TO THE MSDS INDEX INSTRUCTIONS TO ASSIST IN THE USE OF THE MANUALS

These manuals are intended as a reference source and are available to all employees 24-hours a day. Also included in the MSDS Manual is a copy of our compliance program, instructions on how to interpret an MSDS and a copy of California's Code of Regulations General Industry Safety Orders (G.I.S.O.), Section 5194. The MSDS Reference Manuals are green in color and are located as follows:

1. Safety Department
2. Warehouse #1
3. Gate 4
4. Photocopy Room - East Lab entrance door
5. Environmental Department
6. Tech Services Department
7. Heavy Oil Control Room (Division C)
8. Long Beach Marine Terminal - Bridge set

HAZARD COMMUNICATION COORDINATOR: Craig Neighbarger, Ext. 467

FOR EMERGENCY MEDICAL ATTENTION: Call 77 (Fire Department)

NON-EMERGENCY MEDICAL ATTENTION: WorkCare (310) 698-0811 (Whittier Presbyterian Hospital)

POWERINE OIL COMPANY

PROPOSITION 65

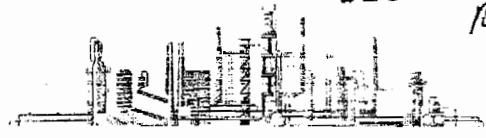
Proposition 65 requires that a clear and reasonable warning be given to persons exposed to listed chemicals. The governor publishes a list of chemicals "known to the state to cause cancer or reproductive toxicity." This POC facility refines, transports and stores crude oil, petroleum and chemical products.

Due to our operations, gasoline vapor containing benzene may be emitted from this facility. Benzene is known to the State of California to cause cancer. Detectable amounts of some chemicals known to the State to cause cancer, birth defects, or other reproductive harm may be found in crude oil, petroleum products or their vapors.

Elco Fractal

NOV 6 1992

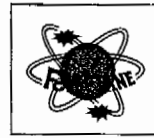
DEC 04 1992
10049K
YEAMAN
Rec ARE



POWERINE Oil Company

12354 Lakeland Road, P.O. Box 2108
Santa Fe Springs, California 90670-3857

(310) 944-9861
(310) 944-6111



TLX No: 4720404
A/B Powerne
Telecopy No: 944-8522

November 3, 1992

Attachment in Report

Mr. Yasser Aref
California Environmental Protection Agency
Department of Toxic Substance Control Region 3
Hazardous Materials Specialist
1405 N. San Fernando Blvd, Suite 300
Burbank, California 91504

Re: Request for a variance from the requirement to provide
Liability Coverage for Powerine's ISD Facility CAD008383291

Dear Mr. Yasser Aref:

This letter is in response to issues discussed during the Department of Toxic Substance Control (DTSC) site investigation of our refinery on October 22, 1992. In particular you requested that we address the financial assurance requirements for closure, post closure, and liability coverage for our Interim Status Facility, the Alkylation Neutralization Unit (ANU).

As discussed, we have no indication that the soil below our concrete tanks was contaminated by a release of a hazardous waste. Per your suggestion, we propose to provide financial assurance for closure and post closure after the soil investigation is complete. We are also requesting a variance from the requirement to maintain liability coverage. These are further discussed below.

Some of the pertinent facts, including description of the waste being treated and the neutralization process are summarized in Attachment 1, the ISD Fact Sheet.

Closure and Post Closure

Once subsurface soil sampling and analysis is completed, Powerine will:

- revise our closure cost estimate to include the cost associated with soil clean-up;
- prepare a post closure plan and post closure cost estimate (if necessary), and;
- provide financial assurance that we have the resources to close the ISD and satisfy post closure requirements.

POWERINE Oil Company

California Environmental Protection Agency
Department of Toxic Substance Control Region 3
November 3, 1992
Page 2

The subsurface soil sampling will not be initiated until Powerine receives preliminary approval of the closure plan provided to DTSC on October 22, 1992.

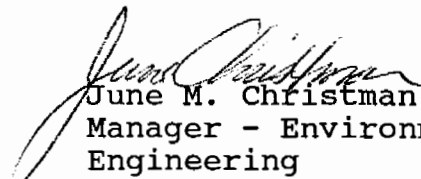
Request for a Variance From Liability Coverage

Powerine requests a variance from the requirement to maintain liability coverage for sudden accidental occurrences in the amount of 1 million dollars per occurrence and 2 million dollars per year as specified by Section 66265.147. The basis for the variance request is that Powerine is altering the alkylation process such that a hazardous waste will no longer be generated or treated. This will ensure that there could be no accidental occurrence associated with the release of a hazardous waste. The refinery and the ANU will be temporarily shutting down in early November. When (and if) the refinery starts back up (in February of 1993) the in-line neutralization will be in full operation.

A description and diagram of the modified in-line neutralization process were mailed to the DTSC on September 1, 1992. A similar though somewhat more comprehensive package was also sent to the South Coast Air Quality Management District (SCAQMD). Based on conversations with the SCAQMD, we anticipate that a Permit to Construct (PTC) will be issued by mid-November 1992.

Should you have any additional questions, please contact Ted Metrose of my staff or myself.

Sincerely,


June M. Christman
Manager - Environmental
Engineering

TKM:aj/DTSC-R3.doc
Enc: Attachment 1 ISD Fact Sheet

cc: Jose Kou (DTSC)
M. Abbasfard (w/attachment)
M. Egner (w/attachment)
W. Chiang (w/attachment)
T. Metrose (w/attachment)
R. Robertson (w/attachment)
File (DTSC-10/23)

ISD Fact Sheet

Owner\Operator: Powerine Oil Company

Address: 12354 Lakeland Road
Santa Fe Springs Ca 90670

Business: Petroleum Refining and Wholesale Marketing

SIC Code: 2911

Generators ID No: CAD 008383291

ISD Facility Name: Alkylation Neutralization Unit (ANU)

ISD Facility Number: CAD 008383291

ISD Issue Date: April 6, 1981

ISD Termination Date: November 8, 1992, pursuant to the Health
and Safety Code Section 25200.7(f)

ISD Brief Summary: Elemental neutralization of acidic waste in
subsurface concrete tanks

Waste Stream Treated: Alkylation regeneration bottoms,
with a pH of less than 2

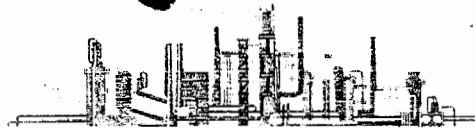
RCRA Waste Code: D002

<u>Part A Summary:</u>	<u>On submitted Part A</u>	<u>Correct</u>
Process Code:	T04 Other treatment	T01 Tank Treatment
Design Capacity:	19,000 gallons	38,000 gallons
Process Descrip:	Concrete walled Aerated pits	Concrete tanks with mechanical mixers
Est amt treated:	51 tons\year	405 tons\year

ISD Description: The ANU is a small treatment facility, used
to neutralize acidic regeneration bottoms
produced as an undesirable by-product of the refinery's
hydrofluoric alkylation plant (Alky).

Alky regeneration bottoms or "regen bottoms" are a mixture of
hydrofluoric acid, water and an organic polymers. Prior to
neutralization, regen bottoms have a pH of less than 2 and are

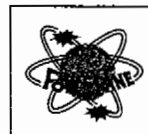
classified as a RCRA hazardous waste due to corrosivity. Regen bottoms were purged from the polymer surge drum into a three section underground concrete tank. Hydrated lime and tank mixers were used to keep the pH in the tank above 7. The acidic regen bottoms were neutralized upon being purged into tank. An insoluble salt calcium fluoride is formed. This non-hazardous waste salt sludge is then removed by vacuum truck for offsite disposal.



POWERINE Oil Company

12354 Lakeland Road, P.O. Box 2108
Santa Fe Springs, California 90670-3857

(310) 944-9861
(310) 944-6111



TLX No: 4720404
A/B Powerne
Telecopy No: 944-8522

VIA FACSIMILE

October 19, 1992

Guillermo A. Hernandez
California Environmental Protection Agency
Department of Toxic Substances Control (DTSC)
Region 3/Facility Management Branch
1405 N. San Fernando Blvd., Suite 300
Burbank, California 91504

Subject: Review of DTSC Requests Made During Facility Inspection
on October 16, 1992

Dear Mr. Hernandez:

Per your facility inspection of October 16, 1992, we understand you need copies or other supporting verification of the following:

- 1) The Interim Status Document (ISD) Waste Analysis Plan, Closure Plan, and Closure Cost Estimate pertaining to the Alkylation Neutralization Unit (ANU); *no liability - no first closure reserve*
- 2) Evidence of an agreement by a local hospital to handle Powerine emergencies including planned response to a hazardous waste emergency, particularly from the ANU; *O.K.*
- 3) A list of tank/container inspections excluded recyclable materials and hazardous waste, especially in the ANU; *O.K.*
- 4) List of emergency equipment used to respond to the release of hazardous waste and other related emergencies; *-O.K.*
- 5) Training records for Judi Gardner and Emergency Response personnel, Bill Ingraham, John Magaña, and Craig Neighbarger. Note: a previous request for documentation of ANU operators training was rescinded; *-O.K.*
- 6) Laboratory analysis of wastes and recyclable materials from our profile/characterization notebook marked by Ms. Kathleen Yokota;
- 7) Verification, either directly with or via USA trucking that the ultimate receiver of excluded recyclable materials, principally from California Portland Cement Company is in fact

- need business plan or letter

POWERINE Oil Company

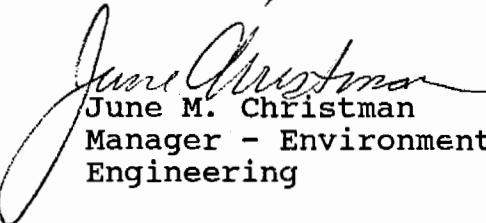
California Environmental Protection Agency
Department of Toxic Substances Control (DTSC)
October 19, 1992
Page 2

receiving the material and managing the material properly.

- 8) Waste profile breakdowns from the Laidlaw in Buttonwillow for the "waste filter" stream;
- 9) Acceptance letter from the Chemical Waste Management facility for the "facility clean up" stream;
- 10) Records of the County Department of Health Services oversight of the recent naphtha line leak on Lakeland Road;

We are now in the process of copying the regulated documentation and securing additional verification. Please contact me should you require any additional information prior to your inspection during the week of October 19, 1992.

Sincerely,



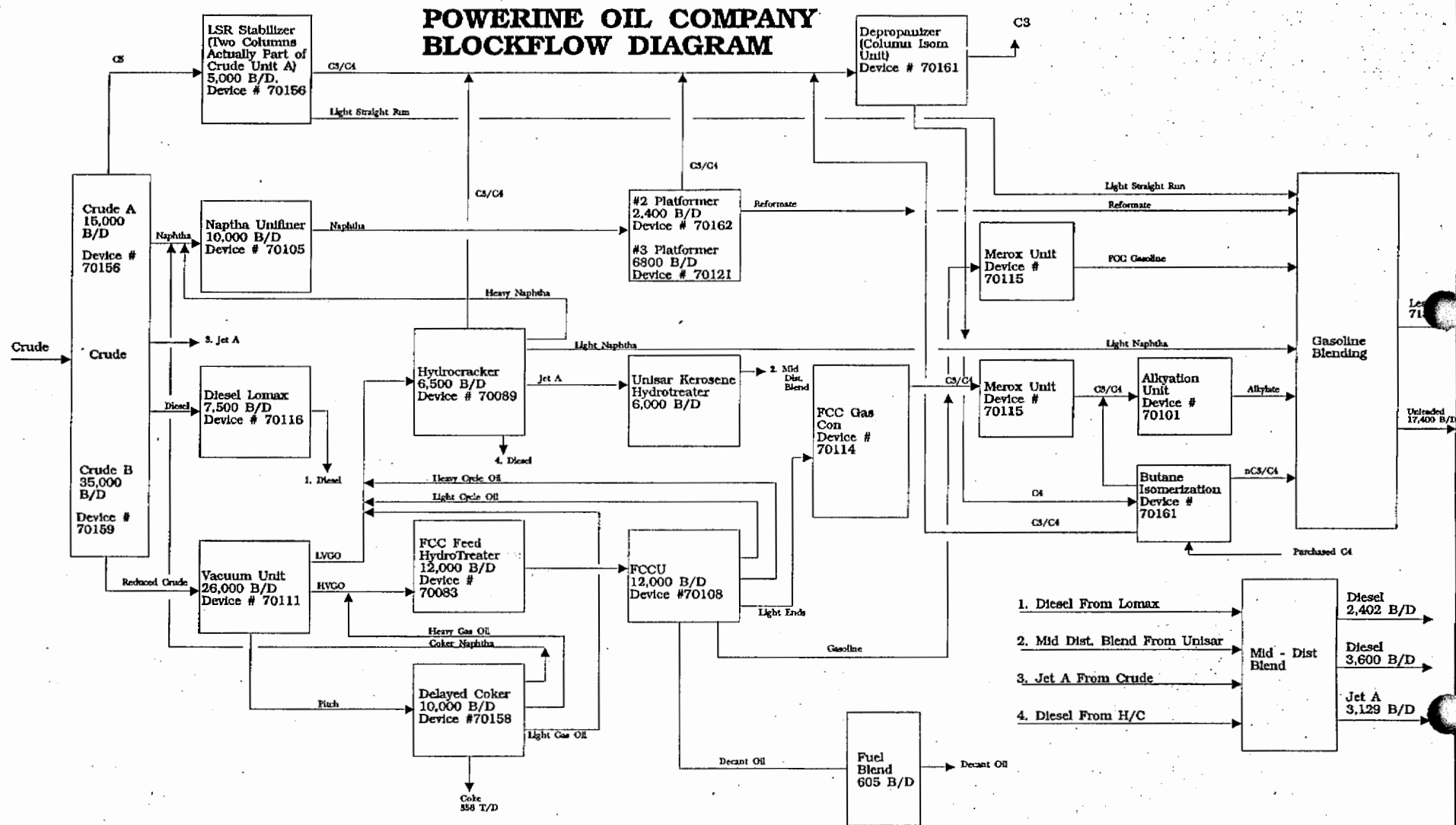
June M. Christman
Manager - Environmental
Engineering

MAW/DTSC1016.doc

cc: M. Gnagy
G. Gardner
J. Magaña
~~T. Metrose~~
M. Winefield
File

bcc: A. L. Gualtieri
M. Abbasfard

POWERINE OIL COMPANY BLOCKFLOW DIAGRAM



UNIVERSITY OF CALIFORNIA, IRVINE
University Extension



This is to certify that

Sudi R. Gardner

has completed requirements for the

**CERTIFICATE IN HAZARDOUS
MATERIALS MANAGEMENT**

MAY 1991

Date

Melvin E. Hall, Dean, University Extension

The Governor's Office of Emergency Services
CALIFORNIA SPECIALIZED TRAINING INSTITUTE

San Luis Obispo, California

This is to certify that

Judi R. Gardner

has successfully completed the
Hazardous Materials Course

"FIRST RESPONDER OPERATIONAL"

as defined in California Code Section 1503

and in recognition therefore is awarded
this Certificate of Achievement

December 19, 1990

Date

OR8637

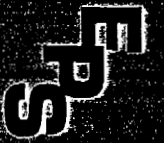
Certificate Number

24

Certified Hours

John Miolla
Director

Stephen L. East
Certified Instructor



EMERGENCY PLANNING SPECIALISTS

Judi R. Gardner

has completed 8 hours of instruction in

Incident Command System Training

6100 Waterbury Ct. • Yorba Linda, CA • 92687
(714) 692-0291 • FAX (714) 692-2796

Judi R. Gardner

10/12/90

EPS INSTRUCTOR / Date

Industrial Emergency Council

A CACR Organization

as authorized and upon the
recommendation of the faculty
hereby confers upon

Judi R. Gardner

Powerline Oil Company

Certificate of Completion

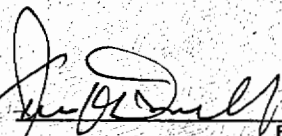
24 hours

First Responder/Operations

with all rights, benefits, and privileges

appertaining thereto.

Given this month of December, one thousand
nine hundred ninety



PRESIDENT



PRIMARY INSTRUCTOR

OSHA 29 CFR 1910.120 P00911

Certificate of Training

David L. Bales

568-15-9492

has met the 40 hour Initial Training requirement
for the Hazardous Waste Operations &
Emergency Response

MA Allard

Acknowledgement

Expiration : 2/92

Occupational Health & Safety Group, Inc.

POWERINE OIL COMPANY

THIS IS TO CERTIFY THAT

DAVID M. BAILES

HAS SUCCESSFULLY COMPLETED THE

HAZWOPER
COURSE
FIRST RESPONDER

as defined in CGG 1503 and 29 CFR 1910.120

6-10-92

DATE

00000

CERTIFICATE NUMBER

[Signature]
SAFETY MANAGER

[Signature]
CERTIFIED INSTRUCTOR

530

#

POWERINE OIL COMPANY

MEMORANDUM

DATE: October 19, 1992
TO: Michael Gnagy
FROM: Marty Duran

As requested, attached is a copy of the procedures currently being followed when handling work related injuries (Chapter 12 of our Safety Manual).

Page 4, Section III.A., states that when an injury involves a hazardous material, Powerine personnel are instructed to send a copy of the pertinent MSDS to the medical provider along with the "Authorization for Treatment" slip.

As outlined on Page 2, Section I, our medical treating facility is WorkCare or the Emergency Room at Presbyterian Intercommunity Hospital. I've attached a copy of our service agreement.

Let me know if you need more information.



DEPARTMENT OF TOXIC SUBSTANCES CONTROL

(REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

BURBANK, CA 91504

(818) 567-3000



SURVEILLANCE AND COMPLIANCE REPORT HAZARDOUS WASTE GENERATORS/ TRANSPORTERS/TSDFs

Date of Inspection 10 / 16 / 92

CA 008383291

EPA I.D. #

Inspector's Name: G. HERNANDEZ

Facility Name/Address:

Mailing Address:

Ownership:

POWERINE OIL CO
 12354 LAKELAND RD
 SANTA FE SPRINGS
 CA 90670

SAME

County L.A.

Type of business:

Persons present:

OIL REFINERYR. KOU, T. GUTIERREZ,

Contact Person

K. YOKOTA, G. HERNANDEZMATT WH. TED METROSET. METROSE, M. WINEFIELD,Phone # (213) 944-6111J. GARDENY

Samples taken?

☐ Yes (receipt attached)☒ No

Plan of Correction necessary?

☐ Yes (Due date: _____)☐ No

Discussions with Management:

RECEIVED CONSENT FROM TED METROSE TO CONDUCT INSPECTION.

PURSUANT TO T-22, CCR, SECTION 66272.1 (C), DTSC REQUEST THAT ALL DRUMS IN THE HAZARDOUS WASTE STORAGE AREA (S/E PORTION OF FACILITY) NOT BE REMOVED OR DISPOSED OF FOR A PERIOD OF 30 DAYS. (CONT)

Facility operating under: ☒ ISD☐ Permit☐ Other _____

On this date an inspection of your facility was conducted under authority of Section 25185, California Health and Safety Code (H&SC) and Section 66272.1, Title 22, California Code of Regulations. The collection of samples or other evidence, including the taking of photographs, was done under authority of Section 66272.1, Title 22, California Code of Regulations. Specific violations of one or more Sections of the H&SC; Title 22, California Code of Regulations; or Code of Federal Regulations, Part 40 are noted above. These violations relate to the generation, storage, handling, transportation, and/or disposal of hazardous and extremely hazardous waste.

Authorized Representative of Firm*

Authorized State Agent

Name TED METROSEName Gillermo "Memo" HernandezTitle SA ENGRTitle Asbestos Materials SpecialistSignature [Signature]Signature [Signature]Date 10/16/92Date 10/16/92

* Signature of firm representative signifies receipt of copy of this form

50

REQUESTED COPIES OF VARIOUS DOCUMENTS
TO BE SUPPLIED NEXT WEEK (CONTINUATION
INSPECTION).

*Shchert A***POWERINE OIL COMPANY****12354 LAKELAND ROAD
SANTA FE SPRINGS, CA 90670****TELEPHONE: (310) 944-6111
TELECOPY NO: (310) 944-8522**DATE: 10/15/92 TIME: _____TO: ~~General~~ Memo HernandezCOMPANY: DTSSFAX NO.: 918 567-3125FROM: Ed MetzgerSUBJECT: Ally Neutral Unit - letterMESSAGE: Please see original for pictures of tank

Also enclosed is a letter to us from ^{discrepancies} ~~the~~ EPA which basically says that identified during the CEI conducted July 30, 1990 have already been rectified to their satisfaction. See last page

POWERINE Oil Company

12354 Lakeland Road, P.O. Box 2108
Santa Fe Springs, California 90670-3857

(310) 944-9861
(310) 944-6111



TLX No: 4720404
A/B Powerne
Telecopy No: 944-8522

September 1, 1992

Mr. Jose Kuo
Unit Chief
Department of Toxic Substance Control
DHS - Toxics Substances Control Program
1405 N. San Fernando Blvd. Suite 300
Burbank CA 91504

Re: Notification of termination of use and intent to close the
Alky Neutralization Unit, an ISD Facility

Dear Mr. Jose Kuo:

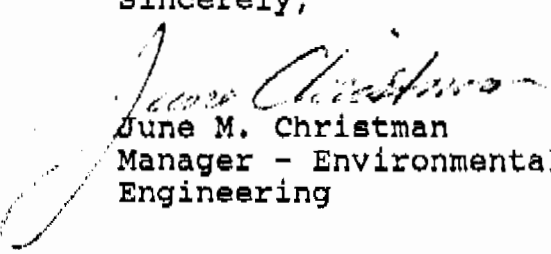
Powerine is hereby notifying you that we have terminated use of and intend to close our Alky Neutralization Unit (ANU) which is an Interim Status ISD Facility. We originally planned to convert the plant to an ISD facility to Permit-By-Rule (PBR). During the process to assess an underground tank for PBR, we noticed a leak in small sections of the tank floor. Although the leak did not compromise the integrity of the tank, we considered the risk of using the tank and close the ANU rather than convert to PBR. The non-hazardous contents of the tank have been removed and disposed at a Class II landfill. The site plan will be altered such that we no longer generate or store waste.

Enclosed is a copy of your most recent Closure and Partial Closure report so that we may revise our existing closure plan, accordingly.

The attached report provides a synopsis of the current regulatory and physical status of the ANU. It also contains an update on the progress that has been made towards terminating use of the ANU by altering the regeneration process.

Should you have any questions please contact Ted Metrose of my staff at 310/944-6111.

Sincerely,


June M. Christman
Manager - Environmental
Engineering

TKM:alky-clo.txt

Termination of Use and Intent to Close the Alkylation Neutralization Unit

Description of Curtailed ANU Operation

The Alky Neutralization Unit (ANU) was used to neutralize acidic alkylation (alky) regeneration bottoms which is a mixture of acid, water and an organic polymer referred to as "tar". The acid and water form an azeotrope referred to as Constant Boiling Material which will not vaporize under atmospheric conditions. The regeneration bottoms have a pH of less than 2. Regeneration bottoms were purged from the polymer surge drum into an underground concrete tank. Hydrated lime and tank mixers were used to keep the pH in the tank above 7. The acidic regeneration bottoms were neutralized upon being purged into the tank and an insoluble calcium fluoride salt was formed. This non-hazardous waste sludge is then removed by vacuum truck for off-site disposal. Powerine has characterized the neutralized regeneration bottoms as nonhazardous based on comprehensive analytical data presented as Attachment 1.

Regulatory Background

Prior to neutralization, the regeneration bottoms with a pH of less than 2 meet the federal definition of a RCRA hazardous waste due to corrosivity. However, a RCRA permit is not required to treat the regeneration bottoms because elementary neutralization is exempt pursuant to the Code of Federal Regulations Part 40 Section 264.1(6). The EPA confirmed the exemption in a letter to Powerine Oil dated June 10, 1981, (Attachment 2) which stated that a RCRA permit was not required. However, since the State does not have a similar exemption, Department of Health Services (DHS) now Department of Toxic Substances Control (DTSC) issued an Interim Status Document (ISD) (number CAD008383291) as a temporary operating permit on April 6, 1992. This permit is presented as Attachment 3.

The (ISD) will terminate on November 8, 1992, pursuant to the Health and Safety Code Section 25200.7(f). To maintain a valid operating permit, Powerine originally intended to convert the permit status of the ANU from an ISD facility to a fixed treatment unit (FTU) operating pursuant to Permit-By Rule (PBR). In a letter dated January 30, 1992 (Attachment 4) Powerine sent a Notification of Intent to operate pursuant to PBR to the DTSC.

Results of Tank Inspection and Assessment

To satisfy the requirements for operation pursuant to PBR, Powerine prepared to conduct an assessment of underground tanks. According to the California Code of Regulations (CCR) Section 87450.2(b)(3)(1), existing tanks operating pursuant to PBR must be assessed according to the criteria specified in Section 66265.191(a). The neutralized (non-hazardous) contents of the tank were removed. The tank was hydroblasted to remove the calcium fluoride-lime sludge from the tank walls and bottom, to facilitate the assessment. Visual inspection of the tank in June of 1992 indicated that there were small sections of concrete erosion such

that steel reinforcement bars (re-bar) were exposed. Several pictures of the tank are presented as Attachment 5.

While there was superficial erosion of the tank, there was no evidence that acidic regeneration bottoms had been released. In fact, the tank was observed to contain free standing water (from the hydroblasting). While chemical erosion can not be eliminated as a contributing factor to degradation of the tank bottom, physical abrasion caused by eddy currents established by the mixers probably played a larger role. The tank bottom erosion was located in the center of the tanks directly under the tank mixers. The exposed re-bar showed no signs of excessive corrosion. These two indicators support the conclusion that physical abrasion caused the erosion. Strict operating procedures ensure that pH of the tank contents is above 7.

While there is no evidence to suggest that there was a release of a hazardous waste, we believe that continued extended use of the underground tank without repairs is imprudent. Consequently additional flow of acidic regeneration bottoms into the tank has been terminated. Powerine has decided to close the tank and the entire alky neutralization unit.

Interim Measures:

Before a permanent process change to eliminate the generation of a hazardous waste can be engineered and installed, Powerine has taken certain interim measures.

These interim measures include piping and operational changes. Flow of the regeneration bottoms from the polymer surge drum have been hard-piped to an above-ground steel Baker tank. Lime is mixed with water in a small (40 bbl) temporary tank, located at ground level for easy and safe access by operating personnel. This lime solution is then pumped into the Baker tank to maintain a pH of 7 or higher.

This interim method of neutralizing the regeneration bottoms will continue until the permanent process change described below can be implemented.

Permanent Process Change: Eliminate Hazardous Waste Generation and Treatment

The regeneration process that occurs within the alkylation unit will be altered such that hazardous waste is no longer produced. Enclosed as Attachment 6 is a diagram of the new process which provides that neutralization of the regeneration bottoms is done as part of the process. Acidic regeneration bottoms do not exit the regeneration section of the Alkylation unit. Further, no subsurface tanks are employed in the new process. Finally the amount of non-hazardous sludge generation is expected to decline by 30% because; in-line neutralization of the regeneration bottoms will be more effective than neutralization in the ANU.

Closure

Powerine intends to comply with the applicable requirements for closure and post closure as specified by:

1. Applicable sections of the specific ISD (CAD0083291) for the ANU
2. Applicable sections of Article 7 and Article 8 of Division 4.5 of Title 22 of the CCR which regulates all ISD facilities
3. Article 10 and more specifically Section 66265.197 which defines the closure and post closure for ISD facilities consisting of tanks.

However the DTSC should recognize that many of these closure and post closure requirements will have only limited applicability because 1.) the material that actually was stored in the tank is a non-hazardous waste and 2.) the sludge has already been removed from the pit. As such the requirement to remove all of the hazardous waste and the requirement that Powerine maintain the financial responsibility for doing so, is moot.

- Attachment 1: Alky sludge characterization
- Attachment 2: RCRA exemption letter from EPA
- Attachment 3: Cover Page of Interim Status Document
- Attachment 4: Letter Notification of Intent to Operate pursuant to PBR
- Attachment 5: Picture of Underground Tanks
- Attachment 6: Diagram of In-Process Neutralization System

ATTACHMENT 1-A
slur

ASSOCIATED LABORATORIES

806 North Batavia - Orange, California 92668 - 714/771-8900

FAX 714/538-1209

CLIENT

~~Sample was~~
 taken from
 Baker tanks

(3877) LAB NO. G15146
 REPORTED 09/13/91

SAMPLE Sludge (Hydrofluoric Acid w/Lime) RECEIVED 08/27/91
 IDENTIFICATION Powerine Oil Co.
 Date Collected 08/26/91 @ 12:30 pm
 BASED ON SAMPLE As Submitted

CAM INORGANICS	LIMITS		Alky (Baker Tank) TTLC (mg/kg)
	TTLC (mg/kg)	STLC (mg/l)	
Antimony	500	15	12.5
Arsenic	500	5.0	2.90
Barium	10,000	100	62.9
Beryllium	75	0.75	ND< 0.4
Cadmium	100	1.0	ND< 0.4
Chromium, Hex.	500	5	ND< 1
Chromium, Total	2,500	560	4.12
Cobalt	8,000	80	1.72
Copper	2,500	25	5.48
Fluoride	18,000	180	461
Lead	1,000	5.0	ND< 5
Mercury	20	0.2	ND< 0.08
Molybdenum	3,500	350	5.09
Nickel	2,000	20	3.96
Selenium	100	1.0	ND< 1
Silver	500	5	1.40
Thallium	700	7.0	ND< 1
Vanadium	2,400	24	5.48
Zinc	5,000	250	7.79

Cont. on page 2

TESTING & CONSULTING
 Chemical

ATTACHMENT 1-B

Client: Waste Materials Management
 Lab No.: G15146
 Date: September 13, 1991

TCLP EXTRACTION - SEMIVOLATILES

	<u>Limits</u> (mg/l)	<u>Method</u>	<u>Results</u> (mg/l)
o-Cresol	200.0	8270	ND< 0.8
m-Cresol	200.0	8270	ND< 0.8
p-Cresol	200.0	8270	ND< 0.8
Cresol	200.0	8270	ND< 0.8
1,4-Dichlorobenzene	7.5	8270	ND< 0.8
2,4-Dinitrotoluene	0.13	8270	ND< 4
Hexachlorobenzene	0.13	8270	ND< 0.8
Hexachloro-1-3-butadiene	0.5	8270	ND< 0.8
Hexachloroethane	3.0	8270	ND< 0.8
Nitrobenzene	2.0	8270	ND< 4
Pentachlorophenol	100.0	8270	ND< 4
2,4,5-Trichlorophenol	400.0	8270	ND< 4
2,4,6-Trichlorophenol	2.0	8270	ND< 40
Pyridine	5.0	8270	

TCLP EXTRACTION - VOLATILES

	<u>Limits</u> (mg/l)	<u>Method</u>	<u>Results</u> (mg/l)
Benzene	0.5	8240	ND<0.005
Carbon Tetrachloride	0.5	8240	ND<0.005
Chlorobenzene	100.0	8240	ND<0.005
Chloroform	6.0	8240	ND<0.005
1,2-Dichloroethane	0.5	8240	ND<0.005
1,1-Dichloroethylene	0.7	8240	ND<0.005
Methyl-ethyl-ketone	200.0	8240	ND<0.03
Tetrachloroethylene	0.7	8240	ND<0.005
Trichloroethylene	0.5	8240	ND<0.005
Vinyl Chloride	0.25	8240	ND<0.01

ASSOCIATED LABORATORIES, by:

Edward S. Behara, Ph.D.
 Vice President

ESB/ql

NOTE: Unless notified in writing, all samples will be discarded by appropriate disposal protocol 30 days after analysis.



ATTACHMENT 1-2

REPORT OF LABORATORY ANALYSIS

Powerine Oil
12354 Lakeland Rd.
Santa Fe Springs, CA 90670

*Alky Neutralized material
from Bakelite tank - agitated*

sure
April 20, 1992
PACE Project Number: 7204175

Attn: Ms. Judi Gardener

Client Reference: Waste Water

PACE Sample Number:	75 0074591
Date Collected:	04/10/92
Date Received:	04/11/92
Client Sample ID:	Waste
<u>Parameter</u>	<u>Units</u> <u>MDL</u> <u>Water</u>

SUBCONTRACT ANALYSIS

INDIVIDUAL PARAMETERS

Acute Aquatic Toxicity (Bioassay)	mg/L	LC50 > 500
-----------------------------------	------	------------

MDL Method Detection Limit

These data have been reviewed and are approved for release.

Kenneth D. Faust,
Southern California Regional Director

ATTACHMENT 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

1821
215 Fremont Street, 28
San Francisco, Ca. 94105

JUN 10 1981

Mr. T. L. Antonoplos
Powerine Oil Co.
12354 Lakeland Road
Santa Fe Springs, CA 90670

Re: Santa Fe Springs Facility (EPA ID No. CAD008383291)

Dear Mr. Antonoplos:

The Environmental Protection Agency (EPA) has received Part A of a permit application pursuant to Section 3005 of the Resource Conservation and Recovery Act (RCRA) for the facility referenced above. The application does not demonstrate that the facility is one which is required to have a permit under Section 3005 of RCRA.

On November 17, 1980, EPA granted an exclusion from individual RCRA permit requirements to facilities which are used for neutralizing wastes which are hazardous only because they exhibit the corrosivity characteristic defined in 40 CFR 261.22, if the neutralization process takes place in a tank, container, transport vehicle, or vessel. It appears from the Part A permit application that the subject facility comes under this exclusion.

For this reason, stated above, we are returning your permit application. If the facility referenced above is in fact one which is required to have a permit under RCRA, you must resubmit this application within thirty days. A cover letter describing the reason(s) for requiring a permit should accompany your application.

If you have any questions in this regard, please contact me or my staff at (415) 556-1047.

Sincerely,

William D. Wilson
Hazardous Materials Branch

Enclosure

ATTACHMENT 3

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

EDMUND G. BROWN JR., Governor

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET

SACRAMENTO, CA 95814



Facility: Powerine Oil Company)
12354 Lakeland Road)
Los Angeles County)
Santa Fe Springs, CA 90670)

INTERIM STATUS DOCUMENT

Number: CAD 008383291

Effective Date: April 6, 1981

Operator: Powerine Oil Company)
12354 Lakeland Road)
Santa Fe Springs, CA 90670)

Pursuant to Section 25200.5 of the California Health and Safety Code, this Interim Status Document is hereby granted to Powerine Oil Company subject to the conditions set forth in Attachment A which by this reference is incorporated herein.

Harvey F. Collins
Harvey F. Collins, Ph.D., Chief
Environmental Health Branch

ATTACHMENT 4

POWERINE Oil Company

12354 Lakeland Road, P.O. Box 2108
Santa Fe Springs, California 90670

(213) 944-9861
(213) 944-6111



TLX No: 4720404
A/S Powerine
Telecopy No: 944-8522

January 30, 1992

Department of Toxics Substance Control
Surveillance and Enforcement Branch
P.O. Box 806
Sacramento, California 95812-0806

Re: Initial Notification for Permit-by-Rule Operation of the Alky
Neutralization Unit

Dear Sirs:

Enclosed as Attachment 1 is an initial notification of intent to operate a small treatment facility at our Santa Fe Springs refinery, under Permit-by-Rule (PBR) for fixed treatment units pursuant to Title 22, California Code of Regulations, Section 67450.2(b). The refinery is currently operating a small neutralization (treatment) facility at the refinery under authority of an Interim Status Document (ISD) (CAD008383291) issued by the Department of Health Services on April 6, 1981. The ISD will terminate on November 8, 1992, pursuant to the Health and Safety Code Section 25200.7(f). Consequently, Powerine wishes to convert the permit status of the Alky Neutralization Unit from a ISD facility to a PBR fixed treatment unit.

As a precondition of PBR status (Section 66270.60(g)(2)), Powerine hereby withdraws a previous request to become a permitted facility under the expectation that the treatment facility will qualify for PBR. (A similar withdrawal request has been forwarded to the Los Angeles Regional Office.)

Please note that current treatment facility is not required to have a RCRA permit because neutralization of a hazardous waste with a pH less than 2 is exempt pursuant to 40 CFR 264.2(g)(6) and 265.1(c)(10). This is verified by the ~~EPA~~ in a letter dated 6/10/81 enclosed as Attachment 2. Consequently, neutralization of acidic hazardous waste will meet the requirement specified in Section 67450.11 that treatment of the waste is not regulated under RCRA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

14 JAN 1991

RECEIVED

JAN 18 1991

Ans'd _____

Donald DuRivage
Powerine Oil Company
12354 Lakeland Road
P. O. Box 2108
Sante Fe Springs, CA 90670-9883

Dear Mr. DuRivage:

A RCRA Compliance Evaluation Inspection was conducted at Powerine Oil Company on July 30, 1990. The inspectors representing EPA found instances of RCRA non-compliance during this on-site inspection and their report was forwarded to you for response. The written responses dated 11/28/90 and 12/20/90 adequately address the violations.

Therefore, the facility operated under EPA identification number CAD008383291 is considered to be in compliance with the RCRA regulations cited as violations during the 1990 inspection.

For any questions regarding this letter, please contact Jean Daniel at (415) 744-2128.

Thank you for your cooperation.

Sincerely,

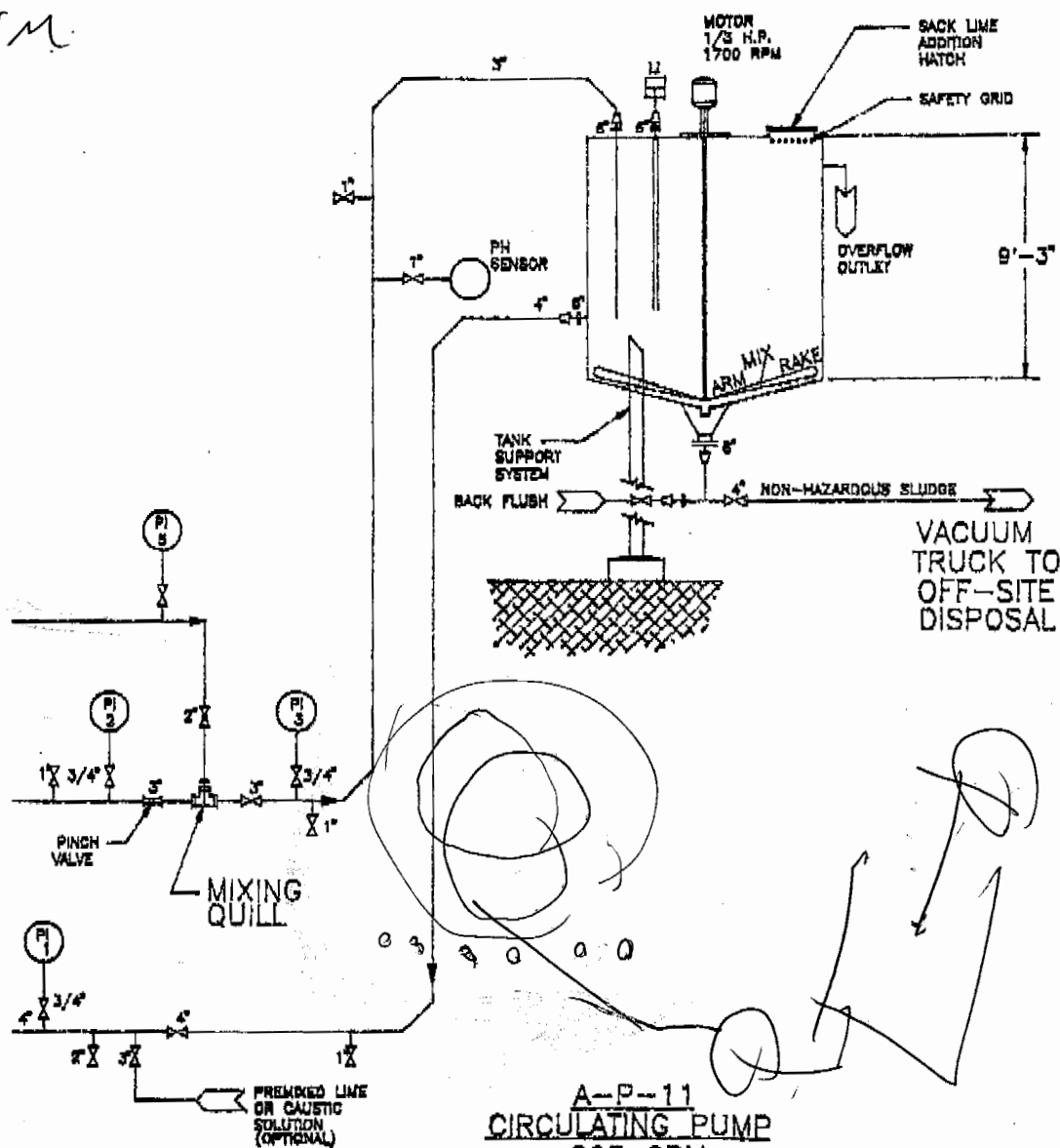
A handwritten signature in cursive script, reading "Karen Schwinn", is written over the typed name.

Karen Schwinn
Chief,
Waste Compliance Branch

cc: June Christman, Manager, Environmental Engineering
Scott Simpson, CA DHS/TSCP, Region 3
Don Johnson, CA DHS/TSCP, HQ
Erlinda MacIntow, HazConPgm, LA County

LIME SLURRY MIXING TANK

11'-0" x 9'-3" HIGH



POWERINE OIL COMPANY
SANTA FE SPRINGS, CALIFORNIA

REPLACES DRAWING OF H-LINE NEUTRALIZATION SYSTEM

SCALE: NONE
DATE: 8/31/8
APPROVED: P
W.D. _____
S.D. _____

APD-4015

HAZARD APPRAISAL AND RECOGNITION PLAN PRESITE VISIT FORM

SECTION A. FIELD TEAM

Prepared By: Gutierrez "Momo" Hernandez
 Date: 10-13-92
 Phone: (818) 567 3024

	Name	Unit/Agency	Responsibility Lead Field Staff
1.	<u>Momo Hernandez</u>	<u>FMB</u>	<u>Lead person/site</u>
2.	<u>Kathleen Yabuta</u>	<u>FMB</u>	<u>J.H. Support</u>
3.	<u>Robert Kow</u>	<u>FMB</u>	<u>photographer</u>
4.	<u>Gina Gutierrez</u>	<u>FMB</u>	<u>photographer</u>
5.	<u>Gina Gutierrez</u>	<u>FMB</u>	<u>photographer</u>
6.			

SECTION B. SITE DESCRIPTION

Site Name: Petroleum Oil Co.
 PCA No.: _____ Project # _____ WP _____
 Address: 12351 Lakeland Rd
 City: Santa Fe Springs State: CA Zip: 90670
 Site Phone No.: (713) 944-9861

NOTE: Attach Map of Site and Directions to Hospital

Contact Person: G.L. Peterson
 Type of Operation/Waste Stream (Describe): Petroleum Refinery
Crude oil and various grades
of gasoline, diesel, and aviation fuels

Purpose of Visit (Describe): Complaint - alleged illegal handling
of Hydrofluoric acid in pits
 Site Visit Date(s): 10-16-92

Estimated Time on Site: Hours/Day 8 Days _____
 Nearest Hospital and Address: 12500 S. Flox Ave
Kaiser Hospital Norwalk
 Phone No.: (713) 920-4321

SECTION C. NUMBER OF SAMPLES TO BE COLLECTED

Air	Surface Impoundment
Drums(s) _____	Surface Water _____
Groundwater _____	Tank(s) _____
Soil/Sediment _____	Waste/Sludge _____
Sump(Pit) <u>HF</u>	Other _____

SECTION D. POTENTIAL HAZARDS

1. Chemical Hazards	2. Physical Hazards
<input type="checkbox"/> Carcinogens	<input type="checkbox"/> Confined Space
<input checked="" type="checkbox"/> Corrosives <u>Sulfuric acid (100%) HF</u> (Source: _____)	<input type="checkbox"/> Heat or Cold Stress (Expected Temp.: _____ °F)
<input type="checkbox"/> Developmental Health Hazards (Teratogen) _____	<input type="checkbox"/> Machinery/Construction
<input type="checkbox"/> Dusts _____	<input checked="" type="checkbox"/> Noise (Source/Decibels) <u>refinery 90</u>
<input type="checkbox"/> Explosives _____	<input type="checkbox"/> Oxygen Deficiency _____
<input type="checkbox"/> Flammables _____	<input type="checkbox"/> Radioactive Materials _____
<input type="checkbox"/> Inorganic Vapors Gases	<input type="checkbox"/> Unknown/Other _____
<input checked="" type="checkbox"/> Metals <u>lib waste containing chromium</u>	<input type="checkbox"/> Biohazards _____
<input type="checkbox"/> Oxidizers _____	<input checked="" type="checkbox"/> Other (Specify): <u>See addendum</u>
<input type="checkbox"/> PCBs _____	
<input type="checkbox"/> Pesticides _____	
<input type="checkbox"/> Reproductive Health Hazards _____	
<input type="checkbox"/> Skin Absorption _____	
<input checked="" type="checkbox"/> Solvents <u>chlorinated (100%)</u>	

(Use this space to describe hazards)

Sampling will be done at the Hydrofluoric
Acid unit. Two methods:
 1) Spigot or Valve (will be collected
by facility personnel).
 2) Using Jar Sampler - 10 samples
will be taken and put in 100% acid
Safe. Sampling will be done at these
Safe area to stand and sampling
can be done approximately 2 feet
from edge of pit.

SECTION E. BASIC INFORMATION ON POTENTIAL HAZARDS

(Attach copies of HARP Chemical Data Sheets or other appropriate information as suggested in instructions.)

SECTION F. EXPOSURE CONTROL METHODS

☐ Engineering ☒ Administrative ☒ Work Practices
 Describe: Avoid unknown waste streams follow all
regulated PPE for known waste streams.
Avoid long period time of exposure.
Investigate only the nature of
the complaint.

SECTION G. REQUIRED PERSONAL PROTECTIVE EQUIPMENT

Level of Protection: ☒ B ☐ C ☒ D walk-through
 Gloves: Outer = O, Inner = I
☒ Cotton/Vinyl ☐ Tyvek
☒ Silver Shield/4H ☐ P. E. Tyvek
☐ Neoprene ☒ Saranex sample in level B.
☐ Nitrile ☐ PVC
☐ PVC/Monkey Grip ☐ Baracade/Chemtuff
☐ Grip Glove/Kevlar ☐ Other: _____
☐ Viton
 Respirator: ☐ A/P Cartridge: _____
☒ SCBA ☐ Escape (ELSA — 5 Min.)

Other Safety Gear:

☐ Binoculars ☒ Hearing Protection Plugs ☒ Muff ☒
☐ Boot Covers ☐ Safety Vest
☒ Boots ☐ Two-Way Communication Kit
☒ Eye Protection ☐ Other: _____
☒ Hard Hats

SECTION H. SURVEY EQUIPMENT

☐ Combustible Gas/Oxygen Meter
☒ Photoionization Detector Probe: #7 10,2
☐ Organic Vapor Analyzer (OVA) ☐ TLV Sniffer
☐ Drager Tubes (Specify: _____)
☒ pH Meter/Paper ☐ WBGT Meter ☐ Noise Dosimeter
☐ Safety Vest Proposed work _____
☐ Two-Way Communication Kit rest _____
☐ Binoculars ☐ Radiation Meter (Victoreen 400)
☐ Aerosol/Particle Monitor
☒ Other (Specify): Noise monitor/personal
monitoring for HF.

SECTION I. OTHER HYGIENE AND SAFETY EQUIPMENT

Available On Site	Bring
<input checked="" type="checkbox"/>	<input type="checkbox"/> Canopy/Tarp/Umbrella
<input checked="" type="checkbox"/>	<input type="checkbox"/> Drinking Water
<input checked="" type="checkbox"/>	<input type="checkbox"/> Shower/Eye Wash
<input checked="" type="checkbox"/>	<input type="checkbox"/> Fire Extinguisher
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> First Aid Kit (check kit)
<input checked="" type="checkbox"/>	<input type="checkbox"/> Plastic Sheet/Buckets/Bags
<input checked="" type="checkbox"/>	<input type="checkbox"/> Portable Toilets
<input checked="" type="checkbox"/>	<input type="checkbox"/> Washing Facilities

SECTION J. PERSONAL MONITORING

☐ Heart Rate ☐ Oral Temperature
 Do You Need Industrial Hygiene Monitoring? ☐ Yes ☐ No
 If Yes, What Type? ☐ Noise ☐ Air ☐ Other (Specify: _____)

SECTION K. REVIEW/APPROVAL

Kathleen S. Yabuta 10/14/92
 Health and Safety Unit (Review) Date
Reg. Peterson 10-15-92
 Supervisor (Approval) Date

WEEKLY INSPECTION

An inspection has been made in the hazardous waste accumulation area and the hazardous materials area for Powerine Oil Company located at 12354 Lakeland Road, Santa Fe Springs, California.

DIV: Environmental

UNIT: Hazardous Waste Accumulation Area

TECH SIGNATURE:

David Bales

DATE: 10-9-92

Equip. No.	Location	Type	Chrg. Date	Remarks
HWAA- D1	(North West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D2	(North East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D3	(South West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D4	(South East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D5	(On North fence line)	Dry-Chem	8-14-92	1900 PSI
HWAA- SS1	Safety Shower	WATER	10-9-92	FLUSHED LINES

		Date	Initials
1.	I have checked all drums containing hazardous waste and found them to be in satisfactory condition.	10-9-92	D.B.
2.	If condition of drums were not acceptable, what action was taken? _____.	10-9-92	D.B.
3.	I have checked all hazardous material drums and found all drums to be in satisfactory condition.	10-9-92	D.B.
4.	If condition of drums were not acceptable, what action was taken? _____.	10-9-92	D.B.

Person notified: _____

Rev. 5/20/91

COMMENTS: NON DEPOSIT DRUMS AND POLLYS BEING REMOVED FROM YARD.

WEEKLY INSPECTION

An inspection has been made in the hazardous waste accumulation area and the hazardous materials area for Powerine Oil Company located at 12354 Lakeland Road, Santa Fe Springs, California.

DIV: Environmental

UNIT: Hazardous Waste Accumulation Area

TECH SIGNATURE: David Bales

DATE: 10-2-92

Equip. No.	Location	Type	Chrg. Date	Remarks
HWAA- D1	(North West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D2	(North East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D3	(South West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D4	(South East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D5	(On North fence line)	Dry-Chem	8-14-92	1900 PSI
HWAA- SS1	Safety Shower	WATER	10-2-92	FLUSHED LINES

		Date	Initials
1.	I have checked all drums containing hazardous waste and found them to be in satisfactory condition.	10-2-92	D.B.
2.	If condition of drums were not acceptable, what action was taken? _____	10-2-92	D.B.
3.	I have checked all hazardous material drums and found all drums to be in satisfactory condition.	10-2-92	D.B.
4.	If condition of drums were not acceptable, what action was taken? _____	10-2-92	D.B.

Person notified: _____

Rev. 5/20/91

COMMENTS: CLEARING OUT JUNKER AND PLOY DRUMS.

WEEKLY INSPECTION

An inspection has been made in the hazardous waste accumulation area and the hazardous materials area for Powerine Oil Company located at 12354 Lakeland Road, Santa Fe Springs, California.

DIV: Environmental

UNIT: Hazardous Waste Accumulation Area

TECH SIGNATURE:

David Bales

DATE: *9-23-92*

Equip. No.	Location	Type	Chrg. Date	Remarks
HWAA- D1	(North West Center)	Dry-Chem	<i>8-14-92</i>	EXTINGUISHER IN GREEN 195 PSI
HWAA- D2	(North East Center)	Dry-Chem	<i>8-14-92</i>	EXTINGUISHER IN GREEN 195 PSI
HWAA- D3	(South West Center)	Dry-Chem	<i>8-14-92</i>	EXTINGUISHER IN GREEN 195 PSI
HWAA- D4	(South East Center)	Dry-Chem	<i>8-14-92</i>	EXTINGUISHER IN GREEN 195 PSI
HWAA- D5	(On North fence line)	Dry-Chem	<i>8-14-92</i>	1900 PSI
HWAA- SS1	Safety Shower	<i>WATER</i>	<i>9-23-92</i>	FLUSHED LINES

		Date	Initials
1.	I have checked all drums containing hazardous waste and found them to be in satisfactory condition.	<i>9-23-92</i>	<i>D.B.</i>
2.	If condition of drums were not acceptable, what action was taken? _____.	<i>9-23-92</i>	<i>D.B.</i>
3.	I have checked all hazardous material drums and found all drums to be in satisfactory condition.	<i>9-23-92</i>	<i>D.B.</i>
4.	If condition of drums were not acceptable, what action was taken? _____.	<i>9-23-92</i>	<i>D.B.</i>

Person notified: _____

Rev. 5/20/91

COMMENTS: *PUTTING ALL REMAINING DRUMS IN ORDER.*

WEEKLY INSPECTION

An inspection has been made in the hazardous waste accumulation area and the hazardous materials area for Powerine Oil Company located at 12354 Lakeland Road, Santa Fe Springs, California.

DIV: Environmental

UNIT: Hazardous Waste Accumulation Area

TECH SIGNATURE:

David Bales

DATE:

9-18-92

Equip. No.	Location	Type	Chrg. Date	Remarks
HWAA- D1	(North West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D2	(North East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D3	(South West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D4	(South East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D5	(On North fence line)	Dry-Chem	8-14-92	1900 PSI
HWAA- SS1	Safety Shower	WATER	9-18-92	FLUSHED LINES

		Date	Initials
1.	I have checked all drums containing hazardous waste and found them to be in satisfactory condition.	9-18-92	D.B.
2.	If condition of drums were not acceptable, what action was taken? _____	9-18-92	D.B.
3.	I have checked all hazardous material drums and found all drums to be in satisfactory condition.	9-18-92	D.B.
4.	If condition of drums were not acceptable, what action was taken? _____	9-18-92	D.B.

Person notified: _____

Rev. 5/20/91

COMMENTS: VENDORS PICKING UP DRUMS. - EMPTY + DEPOSIT.

WEEKLY INSPECTION

An inspection has been made in the hazardous waste accumulation area and the hazardous materials area for Powerine Oil Company located at 12354 Lakeland Road, Santa Fe Springs, California.

DIV: Environmental

UNIT: Hazardous Waste Accumulation Area

TECH SIGNATURE:

David Bales

DATE:

9-11-92

Equip. No.	Location	Type	Chrg. Date	Remarks
HWAA- D1	(North West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D2	(North East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D3	(South West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D4	(South East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D5	(On North fence line)	Dry-Chem	8-14-92	1900 PSI
HWAA- SS1	Safety Shower	WATER	9-11-92	FLUSHED LINES

		Date	Initials
1.	I have checked all drums containing hazardous waste and found them to be in satisfactory condition.	9-11-92	D.B.
2.	If condition of drums were not acceptable, what action was taken? _____	9-11-92	D.B.
3.	I have checked all hazardous material drums and found all drums to be in satisfactory condition.	9-11-92	D.B.
4.	If condition of drums were not acceptable, what action was taken? _____	9-11-92	D.B.

Person notified: _____

Rev. 5/20/91

COMMENTS: CALLING VENDORS OUT TO PICK - UP
DEPOSIT DRUMS.

WEEKLY INSPECTION

An inspection has been made in the hazardous waste accumulation area and the hazardous materials area for Powerine Oil Company located at 12354 Lakeland Road, Santa Fe Springs, California.

DIV: Environmental

UNIT: Hazardous Waste Accumulation Area

TECH SIGNATURE: David Bales

DATE: 9-4-92

Equip. No.	Location	Type	Chrg. Date	Remarks
HWAA- D1	(North West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D2	(North East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D3	(South West Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D4	(South East Center)	Dry-Chem	8-14-92	EXTINGUISHER IN GREEN 195 PSI
HWAA- D5	(On North fence line)	Dry-Chem	8-14-92	1900 PSI
HWAA- SS1	Safety Shower	WATER	9-4-92	FLUSHED LINES

		Date	Initials
1.	I have checked all drums containing hazardous waste and found them to be in satisfactory condition.	9-4-92	D.B.
2.	If condition of drums were not acceptable, what action was taken? _____	9-4-92	D.B.
3.	I have checked all hazardous material drums and found all drums to be in satisfactory condition.	9-4-92	D.B.
4.	If condition of drums were not acceptable, what action was taken? _____	9-4-92	D.B.

Person notified: _____

Rev. 5/20/91

COMMENTS: DOUBLE STACKING CATALYST DRUMS IN YARD
TO MAKE MORE ROOM.

POWERINE OIL COMPANY

Closure Plan and Closure Cost Estimate
for the
Alkylation Neutralization Unit

ISD No. CAD008383291

1.0 INTRODUCTION

This document is Powerine Oil Company's plan for closing the Alky Neutralization Unit (ANU) which was previously operated under the authority of an Interim Status Document (ISD) (CAD008383291) issued by the Department of Health Services. The ANU is located at Powerine's refinery at 12354 Lakeland Road in Santa Fe Springs, California. The ANU is a small treatment facility, used to neutralize acidic regeneration bottoms produced as undesirable by-product of the refinery's hydrofluoric alkylation plant (Alky).

In a letter dated September 1, 1992, Powerine advised the Department of Toxic Substance Control (DTSC) of the following:

- Use of the ANU subsurface concrete tanks was terminated in early June 1992.
- The non-hazardous contents of the ANU tanks had been removed and disposed at a Class II disposal facility.
- An interim procedure for neutralizing acid regeneration bottoms would be implemented until capital improvements are made to the alkylation process that would prevent the generation and treatment of hazardous waste.
- As indicated above, the alkylation process would be altered by installing an in-line neutralization system that would prevent generation of a hazardous waste.
- Powerine intends to close the ISD facility.

Powerine intends to comply with the applicable requirements for closure and post closure as specified by:

1. Applicable sections of the specific ISD for the ANU
2. Applicable sections of Article 22 and Article 23 of Division 4.5 of Title 22 of the CCR which regulates all ISD facilities
3. Article 10 and more specifically Section 66265.197 which defines the closure and post closure for ISD facilities consisting of tanks.

However, DTSC should recognize that many of these closure and post closure requirements have only limited applicability because:

- the material that actually was stored in the subsurface concrete tank is a non-hazardous waste and
- the sludge has already been removed from the subsurface tanks.

As such, the requirement to remove all of the hazardous waste and the requirement that Powerine maintain the financial responsibility for doing so, is moot.

2.0 Closure Performance Standard (Section 66265.111)

Powerine will close the ANU in a manner that:

- ensures the safety of all employees and contractors during actual closure.
- minimizes the need for further maintenance.
- controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere.

3.0 Closure Plan and Amendment of the Plan (Section 66265.112)

This plan addresses closure of the ANU as it originally operated and as it has operated during the interim period. Submittal of the plan to DTSC has been deferred based on conversation Mr. Andy Bajwa of DTSC staff. Mr. Bajwa instructed Powerine to submit the aforementioned termination of use and intent to close letter of

September 1, 1992 and await for additional guidance on preparation of the plan. This plan has been prepared prior to receipt of that guidance.

This plan will be revised upon receipt of the guidance document to the extent necessary. It will be further revised as necessary to complete closure.

3.1 Closure Notification and Plan Submittal

Powerine provided to the district notification of intent to close the ISD on September 1, 1992. Powerine is obligated to submit a closure plan to the DTSC by November 23, 1992. This date is established by Section 66265, 118(e)(1) which mandates that the closure plan be submitted no later than 15 days after termination of the ISD. The ISD for Powerine's ANU terminates November 8, 1992 pursuant to the Health and Safety Code Section 25200.7(f).

On this schedule, if Powerine were to notify the DTSC and provide a copy of the closure plan on November 23, 1992, then closure could begin as early as May 23, 1993. But since the plan has not yet been approved the closure probably will not be initiated until the fall of 1993. Powerine wants to close the ANU as soon as possible because:

- Powerine no longer wants to operate a treatment facility nor pay annual fees associated with such an operation and
- Community relations will be improved by eliminating what may be perceived as a public risk.

Powerine will provide all support necessary to accelerate the closure plan approval process.

3.2 Overview of Closure Plan

Generally closure of the ANU will be implemented by following the steps:

1. Without structurally damaging the north section of the tank, soil samples will be taken from below the East and West sections of the tank. The north section of the tank will be used to collect washdown water and storm runoff so it must remain structurally sound. The soils samples will be analyzed for the contamination that could be associated with release of the acidic regeneration bottoms. Soil sampling will be deepened as necessary to determine the extent of the contamination if any.

2. If soil sampling indicates that there has not been a hazardous waste release then the East and West portion of the Alky Neutralization will be backfilled with clean fill. Powerine will request closure of the ANU in-place, without additional excavation of the concrete structure.
3. If the soil sampling indicates that there has been a hazardous release which can not safely be left in place and which can not be remediated institu, then Powerine will request a partial closure of the ANU. The concrete subsurface tank will be backfilled with clean fill, to assure the DTSC that the susbsurface neutralization has been permantely terminated. Soil contamination below the tank will be addressed if the alklylation plant is replaced or 180 days after Powerine or a subsequent owner determines that the existing refinery is no longer a viable business and must be permanently decommissioned, whichever is first. Under no circumstances shall remediation of soil contaminated by release of a hazardous wastes from the ANU be deemed complete wihout first obtaining DTSC approval.
4. The steel pipes from the polymer surge drum to the interim non-hazardous surface tanks will be decontaminated by flushing them with a basic solution. Decontamination will not be deemed complete until the pipe effluent is pH 7 or greater. The decontaminated pipes will be discarded as scrap metal.

3.3 Maximum Waste Inventory and Disposal Thereof

The maximum volume of acidic regeneration bottoms that can be stored in the lines from the polymer surge drum to the above ground tank or approximately . bbls. In the event that Powerine's neutralization facility is inoperable, a third party contractor will be hired to perform much the same tasks. Offsite transportation and disposal of a highly acidic waste is considered unsafe and without merit. The neutralized material will be disposed at an approved non-hazardous facility.

The neutralized regeneration bottoms previously stored in the subsurface concrete tanks and currently stored in the above ground steel tank are non-hazardous. These sludges are not subject to the inventory estimate of section 66265.112.

3.4 Soil Sampling and Analysis

Two (2) 6" borings will be drilled through and 10 feet below the bottom of the existing subsurface concrete tanks using a powered

auger. Soil samples will be taken on at 1, 5 and 10 feet and analyzed as specified below. Soils encountered in the subsurface will be logged and described according to the Unified Soil Classification System. Soil moisture and other significant characteristics will be noted on the boring logs.

All augers will be thoroughly steam cleaned before drilling each boring. No drilling additives will be used. Upon completion, each borehole will be backfilled from the bottom to within one-half foot of the ground surface with bentonite grout. The top of the boreholes will be capped with concrete, flush to surface of the ANU tank.

Soil samples will be collected using a hand sampler as described in the USHMG, Soil Sampling. All sampling equipment will be thoroughly cleaned before each sample is collected. The cleaning procedure will include a tap water rinse, a thorough scrubbing with tap water and non-phosphate detergent, a second tap water rinse, and a final rinse using distilled water.

The samples will be screened at the drill site for volatile organic vapors using a portable photoionization detector (PID), such as the HNu Model PI 101. PID readings will be recorded on the boring logs. All samples will be capped with a teflon liner and a plastic cap and sealed with electrical tape. Identification labels will be placed on the samples and will indicate the borehole number, date and time of sampling, depth and name of the drilling supervisor. All samples will be stored on "blue ice" and delivered to a California-certified, analytical laboratory within 24 hours of collection. Standard chain-of-custody procedures will be strictly followed in submitting the samples for laboratory analysis.

The soil samples will be analyzed for pH, and fluoride content.

The following information will be presented in the soil assessment report:

- Site history, including a description of the current and previous site usage along with a description of the materials historically contained in the tanks;
- Site geology based on information contained in published and unpublished technical reports and on data derived from a soil borings to be drilled;
- Site hydrogeology based primarily on information contained in published and unpublished technical reports;
- Site layout which will be shown on a scaled plot plan; and

- Sample protocol, including soil sample analysis results, date of sampling, and chain-of-custody documentation.

3.5 Soil Remediation/Disposal Contingency

Should the results of soils analysis indicate that a hazardous release has occurred, at concentration that are potentially harmful to the environment Powerine will submit a soil remediation and disposal plan for approval by DTSC.

4.0 Certification of Closure (Section 66265.115)

When closure is completed, Powerine Oil Company (POC) shall submit to the DTSC and CRWQCB certification by POC and by an independent, qualified professional engineer, registered in California, that the facility will be closed in accordance with the specifications in the approved closure plan.

5.0 CLOSURE SCHEDULE

The schedule for closure is as follows:

Activity	Days
Submittal and DTSC approval of the Closure Plan	Start
Notification to Begin Closure	180
Public Notification and Hearing (Days list as not applicable because this step would be conducted during the 180 notification period.	NA
Drill and log 2 boreholes	30
Analyze soil samples	30
Prepare soil assessment report	30
Backfill subsurface concrete tanks	10
Removal and neutralization of alky regeneration bottoms from pipes. Decontamination of pipes. No additional time required.	NA
<u>Preparation of closure certification report</u>	<u>21</u>
Total Time required from date of notification	121

As can be noted from the above schedule, if there is no subsurface soil contamination caused by the release of a hazardous waste from the ISD then Closure will easily be completed within 180 days as required.

6.0 CLOSURE COST ESTIMATE AND FINANCIAL ASSURANCE

The estimated closure costs are presented on Table 1. Given the relative small cost of closure in comparison to Powerine's operating revenues no financial assurance mechanism was provided.

7.0 Post Closure Care and Use of Property (Section 66265.120)

No hazardous waste from the ANU will remain on site after its closure. Therefore the directives of Section 66265.120 in the CCR do not pertain to this treatment facility. Soil contamination may trigger additional post closure monitoring requirement.

TKM:aj/alky-cp.wps

Table 1

CLOSURE COST ESTIMATE
for the
ALKY NEUTRALIZATION UNIT

<u>Task</u>	<u>Sub Task</u>	<u>Sub Task Total</u>	<u>Task Total</u>
1	PREP, SUBMIT, & FINALIZE CLOSURE PLAN Performed by Powerine	\$0	\$0
2	NOTIFICATION TO BEGIN CLOSURE	\$0	\$0
3	PUBLIC NOTIFICATION	\$400	\$400
4	SOIL SAMPLING and ANALYSIS		
	A Prep SAP and H&S Plan	\$2,000	
	B Drill and log 2 boreholes	\$1,430	
	C Analyze soil samples (6)	\$1,200	
	D Prepare soil assessment report	\$3,000	
	E Subtotal	\$7,630	\$7,630
5	BACKFILL SUBSURFACE CONCRETE TANKS		
	A Clean fill	\$1,778	
	B Equipment and Labors	\$1,384	
	C Subtotal	\$3,162	\$3,162
7	PIPE FLUSH and DECON		
	A Flush sludge and neutralize	\$200	
	B Decon pipes	\$200	
	C Dispose pipes -non haz scrap metal	\$100	
	D Subtotal	\$500	\$500
8	CLOSURE CERTIFICATION REPORT	\$3,000	\$3,000
9	CLOSURE TOTAL		----- \$14,692

Notes: Estimate based on assumption that no soil contamination or remediation if required as a result of hazardous waste release

POWERINE Oil Company
Santa Fe Springs, Ca
Waste Analysis Plan

August 1991
Rev:D
F: alky-WAP

WASTE ANALYSIS PLAN
for the
ALKY NEUTRALIZATION UNIT

1.0 INTRODUCTION

Powerine Oil Company (POC) has prepared a Waste Analysis Plan as required by conditions specified in the Interim Status Document (ISD) for the Alky Neutralization Unit (ANU), granted on April 4, 1981. The Waste Analysis Plan (WAP) has been prepared to satisfy the provisions of Section 67102(b) of the California Code of Regulations.

The WAP is segregated into two major sections, influent and effluent, sections 2 and 3 respectively. The principal influent to the ANU is alkylation regeneration bottoms which typically have a pH of less than 2. There are several other smaller influents streams, of a similar composition, which are basically periodic washes and flushes associated with the HF alkylation unit. Prior to neutralization, alky regeneration bottoms are classified as a RCRA hazardous waste, waste code D002 due to corrosivity.

After neutralization in the ANU the effluent is referred to as a neutralized regeneration bottoms. Normally treatment of the regeneration bottoms in the ANU renders the waste non-hazardous by Federal and State criteria.

1.1 APPLICABILITY OF RELATED REGULATIONS

The principal treatment process which occurs in the ANU is neutralization in tanks. Consequently most of the additional waste analysis specified in Section 67102(b)(6), are not required. Even Section 67258, which applies to treatment in tanks has only limited applicability because the waste stream is from a single source and because it is a relatively constant mixture of organics (polymer), water and hydrofluoric (HF) acid. Nonetheless if the neutralizing agent is changed from hydrated lime to caustic or potassium hydroxide, bench tests studies will be conducted to ensure that the integrity of the tank will not be diminished as a consequence.

2.0 INFLUENT SAMPLING AND ANALYSIS

No sampling of the influent waste stream is conducted on a routine basis. Safety considerations associated with collection of the acidic and highly corrosive regeneration bottoms outweigh the

value of information that can be obtained from routine analysis of the influent.

The composition of the influent is monitored through analysis of the HF acid in the circulating system of the alkylation unit. The circulating HF acid is tested for water content on a daily basis. As long as the water content of HF acid is less than 1.5 percent the composition of the regeneration bottoms are expected to remain fairly consistent. Above this limit the composition of the regeneration will not be a consideration because the alkylation unit will approach shut down. Non-routine sampling while subject to change is described more completely in the section below.

2.1 NON-ROUTINE INFLUENT SAMPLING AND ANALYSIS

2.1.1 Sampling Frequency

Non-routine influent sampling shall be conducted:

1. A minimum of once every five years
2. Whenever the neutralization agent has changed
3. Whenever the generating process has been altered such that the characterization of the influent may be altered.
4. Whenever hazardous waste regulation change such that the waste could be characterized as hazardous for some reason other than low pH (corrosivity).

2.1.2 Sample Location

The sample shall be taken from the sample valve on the line between the regeneration column and the polymer surge drum (PSD).

2.1.3 Number of Samples

Two samples will be required to fully characterize the influent because the regeneration bottoms are comprised of two distinct phases. The upper phase (lower specific gravity) is a polymer (hydrocarbon tar) and the lower phase (higher specific gravity) is a mixture of 60% hydrofluoric acid and 40% water which is referred to as constant boiling materials (CBMs).

2.1.4 Sample Collection, Preservation and Handling

Sample collection, preservation and handling shall be conducted in accordance with the methods prescribed in "Test Methods for Evaluating Solid Wastes, Physical & Chemical Methods" SW-846. Special precautions should be taken when taking the influent samples because of the corrosivity and potential threat to human health.

Samples of each phase should be allowed to settle. Testing should be conducted on the samples taken from the top of the polymer sample and from the bottom of the CBM sample.

2.1.5 Parameters and Methodologies

The parameters and test methodologies for non-routine influent analysis are specified in Table 2-1. Test shall be conducted by an outside lab.

Table 2 - 1

Non-routine Analysis of Influent Sample

	<u>Extract Procedure</u>	<u>Test Preparation</u>	<u>Test Method</u>
<u>A. Total Toxic Inorganics TTLC</u>			
1 Fluoride Salts	na	3050 (a)	340.1 (b)
<u>B. Soluble Inorganics STLC</u>			
1 Fluoride Salts WET	WET (s) (with DI)	3050 (a)	340.1 (b) 340.2
<u>C. TCLP VOLATILE ORGANICS</u>			
1 Benzene	TCLP (d)	5030 (a)	8240 (a)
2 Carbon Tetrachloride	TCLP (d)	5030 (a)	8240 (a)
3 Chlorobenzene	TCLP (d)	5030 (a)	8240 (a)
4 Chloroform	TCLP (d)	5030 (a)	8240 (a)
5 1,2-Dichloroethane	TCLP (d)	5030 (a)	8240 (a)
6 1,1-Dichloroethylene	TCLP (d)	5030 (a)	8240 (a)
7 Methyl Ethyl Ketone	TCLP (d)	5030 (a)	8240 (a)
8 Tetrachloroethylene	TCLP (d)	5030 (a)	8240 (a)
9 Trichloroethylene	TCLP (d)	5030 (a)	8240 (a)
10 Vinyl Chloride	TCLP (d)	5030 (a)	8240 (a)
<u>D. TCLP SEMI-VOLATILE ORGANICS</u>			
1 o-Cresol	TCLP (d)	3550 (a)	8270 (a)
2 m-Cresol	TCLP (d)	3550 (a)	8270 (a)
3 p-Cresol	TCLP (d)	3550 (a)	8270 (a)
4 Cresols (total)	TCLP (d)	3550 (a)	8270 (a)
5 1,4-Dichlorobenzene	TCLP (d)	3550 (a)	8270 (a)
6 2,4-Dinitrotoluene	TCLP (d)	3550 (a)	8270 (a)
7 Hexachlorobenzene	TCLP (d)	3550 (a)	8270 (a)
8 Hexachloro-1,3-Butadiene	TCLP (d)	3550 (a)	8270 (a)
9 Hexachloroethane	TCLP (d)	3550 (a)	8270 (a)
10 Nitrobenzene	TCLP (d)	3550 (a)	8270 (a)
11 Pentachlorophenol	TCLP (d)	3550 (a)	8270 (a)
12 Pyridine	TCLP (d)	3550 (a)	8270 (a)
13 2,4,5-Trichlorophenol	TCLP (d)	3550 (a)	8270 (a)
14 2,4,6-Trichlorophenol	TCLP (d)	3550 (a)	8270 (a)
<u>E. Corrosivity, Ignitability, Reactivity</u>			
1 pH	na	na	9040 (a)
2 Flash Point	na	na	1010 (a)
<u>F. Other Organic Tests</u>			
1 Total Oil and Grease	na	3550 (a)	413.1 (b)
<u>G. Physical Parameters</u>			
1 Specific Gravity	na	na	D-1298 (f)
2 Total Suspended Solids	na	na	209.c (b)

Table 2 - 1

Non-routine Analysis of Influent Sample

Notes:

- (a) Test Methods for Evaluating Solid Wastes, Physical & Chemical Methods "SW-846, third edition, U.S. EPA
- (b) "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-84-017, U.S. Environmental Protection Agency 1984.
- (c) Waste Extraction Procedure (WET) California Code of Regulations Section 66700, CAL- EPA
- (d) Toxicity Characteristic Leaching Procedure (TCLP) also EPA Method 1311 "Federal Register March 29, 1990 Revision to Part 261 Appendix II
- (e) Conduct test only if total flouride content divided by 10 is greater than 180 mg/l, the STLCL.
- (f) ASTM

2.1.6 Rationale for Selection of Parameters

The rationale for testing of the parameters listed in Table 2-1 is as follows:

Free HF	The free hydrofluoric content is critical to determining the efficiency of the regenerator which has a direct impact on the operation of the ANU. The free HF in the polymer should be less than 1%. Higher concentrations indicate that the regeneration temperature is not being operated high enough or iso-butane stripping is not effective. There should be about an equal amount of HF and water in the CBM sample.
Fluorides	Fluorides are measured to determine what percentage of fluorides will solubilize to form CaF.
Volatiles	Volatiles are expected to rise overhead in the regeneration column. However there is a small possibility that some VOCs may have been trapped in larger complex organic compounds, polymers.
Semi-vols	The chlorinated species of the semi-volatiles on the TCLP list of toxic substances are not expected to be found in the effluent. However there is a possibility that cresols and pyridine can be formed during the alkylation process.
pH	The pH is measured to determine the acidity of the regeneration bottoms.
Flash	The regeneration bottoms are not expected to flash at a temperature of less than 100 degrees F. This is a precautionary test.
TOG	The Total Oil and Grease content of the regeneration bottoms is used to determine the organic fractions in the CBM and polymer.
SG	The specific gravity is helpful in determining the composition of the waste in terms of solids, oil and water content.
TSS	POC is charged by the recycling facility based on the solids content of the waste. This value is used to check against the recycling facility.

2.1.7 Recordkeeping

A copy of the non-routine analytical results shall be kept on file with the environmental group until the ANU is closed.

3.0 EFFLUENT SAMPLING AND ANALYSIS

Effluent sampling and analysis is segregated into two distinct phases:

1. Routine
2. Non-routine

Each of these is described in greater detail in sections 3.1.1 and 3.2.

3.1 ROUTINE EFFLUENT SAMPLING AND ANALYSIS

Routine effluent sampling and analysis is conducted to ensure that the ANU is operating safely and efficiently on a day to day basis.

3.1.1 Sampling Frequency

Routine effluent sampling for pH shall be conducted a minimum of two times a day. Other parameters are analyzed once a week. (See section 3.1.5.)

3.1.2 Sampling Location

Effluent samples shall be taken from the alky neutralization tank.

3.1.3 Number of Samples

A single sample shall be deemed sufficient for analysis because the waste stream is from a single source and composition of the waste is fairly consistent. The neutralization tank is large comparison to the rate waste influent and tank mixers further homogenize the regeneration bottoms.

3.1.4 Sample Collection, Preservation and Handling

Sample collection, preservation and handling shall be conducted in accordance with the methods prescribed in "Test Methods for Evaluating Solid Wastes, Physical & Chemical Methods" SW-846.

Even with mixing, the polymer has a tendency to rise to the top of the neutralization tank. Consequently care should be taken to obtain a representative sample. The sample should be taken from the point where the vacuum truck will draw, so that the characterization of the effluent is most representative of the material that will eventually be taken offsite for recycling or disposal.

3.1.5 Parameters and Methodologies

The parameters, tests methodologies and sample frequency for routine effluent sampling are specified in Table 3-1.

Table 3 - 1

Routine Analysis of Effluent Sample

Parameter	Method	Frequency Once per:
pH	pH paper	Shift
pH lab	9040	Week
Alkalinity	2320 B	Week
Solids Content (V%)	Centrifuge	Week
Total Oil & Grease	413.2	Week

Routine testing shall be conducted by POC internal lab.

3.1.6 Rationale for Selection of Parameters

The rationale for testing of the parameters listed in Table 3 - 1 is as follows:

pH	The pH is measured by operating personnel to ensure that enough lime has been added.
pH lab	The lab measures the pH to provide check on field analysis.
Alkalinity	The alkalinity provides a measure of how much excess lime is present. Lime which fails to react is a waste of resources.
Solids	Analysis of solids provides indication of the amount of KF that has been formed. If the solids content is high, solids may be accumulated on the bottom of the tank. It is also used to check the fee basis for offsite recycling of the neutralized regeneration bottoms. The fees are partially based on solids content.
TOG	Total Oil Grease provides a gross measure of the organic content of the neutralized regeneration bottoms. This can be used to assess the viability of recycling the bottoms for hydrocarbon recovery and will provided a relative measure of the amount of polymer in relation to the total effluent.

3.1.7 Recordkeeping

During the calendar year, test results from routine effluent testing will be maintained at the lab. The data shall be recorded on the operations log for the alkylation unit or retained in some other fashion. These results will be submitted to the Environmental group no later than one month after the end of the calendar year. Routine analytical results will be maintained by the environmental group for a period of no less than 3 years.

3.2 NON-ROUTINE EFFLUENT SAMPLING AND ANALYSIS

3.2.1 Sampling Frequency

Non-routine influent sampling shall be conducted:

1. A minimum of once every five years
2. Whenever the neutralization agent has changed
3. Whenever the generating process has been altered such that the characterization of the influent may be altered.
4. Whenever hazardous waste regulation change such that the waste could be characterized as hazardous for some reason other than low pH (corrosivity).
5. Whenever results obtained during routine sampling and analysis varies from the from the previous analysis by more than 30%.

3.2.2 Sample Location

The sample shall be taken from the alky neutralization tank. As stated above the samples should be taken from a well mixed location.

3.2.3 Number of Samples

A single sample shall be deemed sufficient for characterization because the generating process is fairly consistent.

3.2.4 Sample Collection, Preservation and Handling

Sample collection, preservation and handling shall be conducted in accordance with the methods prescribed in "Test Methods for Evaluating Solid Wastes, Physical & Chemical Methods" SW-846.

3.2.5 Parameters and Methodologies

The parameters and test methodologies are specified in Table 3-2. Test shall be conducted by an outside lab.

Table 3 - 1

Non-routine Analysis of Effluent Sample

	<u>Extract Procedure</u>	<u>Test Preparation</u>	<u>Test Method</u>
<u>A. Total Toxic</u>			
<u>Inorganics TTLC</u>			
1 Fluoride Salts	na	3050 (a)	340.1 (b)
<u>B. Soluble Inorganics STLC</u>			
1 Fluoride Salts (e) Lett - id	WET (c) (with DI)	3050 (a)	340.1 (b)
<u>C. TCLP VOLATILE ORGANICS</u>			
1 Benzene	TCLP (d)	5030 (a)	8240 (a)
2 Carbon Tetrachloride	TCLP (d)	5030 (a)	8240 (a)
3 Chlorobenzene	TCLP (d)	5030 (a)	8240 (a)
4 Chloroform	TCLP (d)	5030 (a)	8240 (a)
5 1,2-Dichloroethane	TCLP (d)	5030 (a)	8240 (a)
6 1,1-Dichloroethylene	TCLP (d)	5030 (a)	8240 (a)
7 Methyl Ethyl Ketone	TCLP (d)	5030 (a)	8240 (a)
8 Tetrachloroethylene	TCLP (d)	5030 (a)	8240 (a)
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10 Vinyl Chloride	TCLP (d)	5030 (a)	8240 (a)
<u>D. TCLP SEMI-VOLATILE ORGANICS</u>			
1 o-Cresol	TCLP (d)	3550 (a)	8270 (a)
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14 2,4,6-Trichlorophenol	TCLP (d)	3550 (a)	8270 (a)
<u>E. Corrosivity, Ignitability, Reactivity</u>			
1 pH	na	na	9040 (a)
2 Flash Point	na	na	1010 (a)
<u>F. Other Organic Tests</u>			
1 Total Oil and Grease	na	3550 (a)	413.1 (b)
<u>G. Physical Parameters</u>			
1 Specific Gravity	na	na	D-1298 (f)
2 Total Suspended Solids	na	na	209.c (b)

Table 3 - 1

Non-routine Analysis of Effluent Sample

Notes:

- (a) Test Methods for Evaluating Solid Wastes, Physical & Chemical Methods "SW-846, third edition, U.S. EPA
- (b) "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-84-017, U.S. Environmental Protection Agency 1984.
- (c) Waste Extraction Procedure (WET) California Code of Regulations Section 66700, CAL- EPA
- (d) Toxicity Characteristic Leaching Procedure (TCLP) also EPA Method 1311 "Federal Register March 29, 1990 Revision to Part 261 Appendix II
- (e) Conduct test only if total flouride content divided by 10 is greater than 180 mg/l, the STLC.
- (f) ASTM

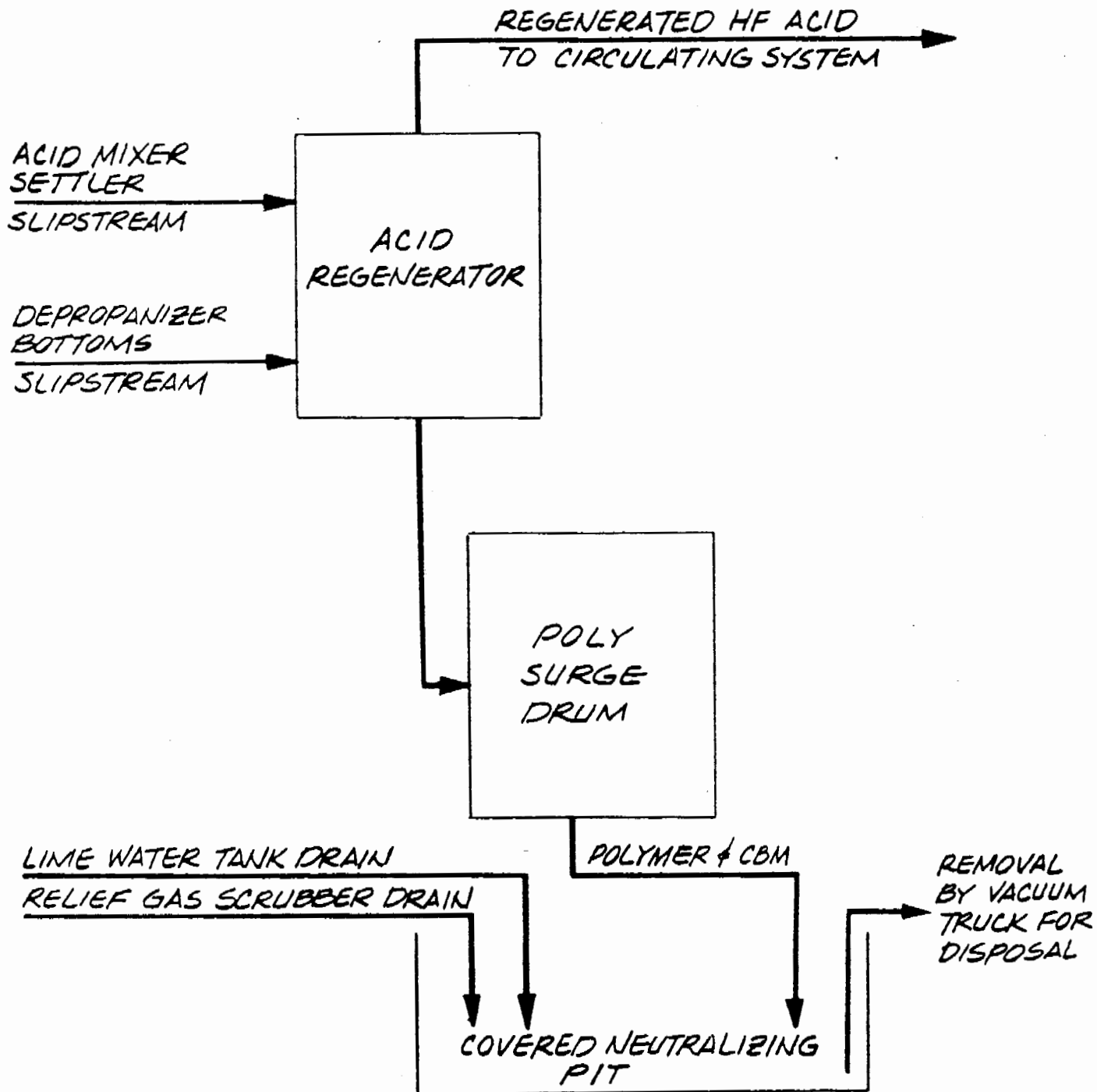
3.2.6 Rationale for Selection of Parameters

The rationale for testing of the parameters listed in Table 3-2 is as follows:

Fluorides	Fluorides are measured to determine what percentage of suspended solids are fluoride salts specifically CaF.
Volatiles	While volatiles organic compounds (VOCs) are expected to rise overhead in the regeneration column there is a small possibility that VOCs may have been trapped in larger complex organic compounds, polymers.
Semi-vols	Chlorinated species of the semi-volatiles on the TCLP list of toxic substances are not expected to be found in the effluent. However there is a possibility that cresols and pyridine was formed in the during the alkylation process.
pH	The pH is measured to ensure that enough lime has been added.
Flash	The regeneration bottoms are not expected to flash at a temperature of less than 100 degrees F. This is a precautionary test.
TOG	The organic content of the neutralized regeneration bottoms is of interest because recycling facilities are recovering the polymer. The Total Oil and Grease (TOG) content provides a gross measure of the organic content.
SG	The specific gravity is helpful in determining the composition of the waste in terms of solids, oil and water content.
TSS	POC is charged by the recycling facility based on the solids content of the waste. This value is used to check against the recycling facility.

3.2.7 Recordkeeping

A copy of the analytical results shall be kept on file with the environmental group until the ANU is closed.



TREATMENT PROCESS
FLOW CHART

POWERINE OIL CO.

12204 LAKELAND RD.

SANTA FE SPRINGS

SCALE
NONE

DESIGNED BY JP

DRAWN BY

DATE
12-20-88

CHECKED BY

APPROVED BY

DEPARTMENT OF HEALTH SERVICES

TOXIC SUBSTANCES CONTROL PROGRAM (REGION 3)

1405 N. SAN FERNANDO BOULEVARD, SUITE 300

BURBANK, CA 91504

(818) 567-3000



April 15, 1991

Ms. June M. Christian
Powerline Oil Company
12354 Lakeland
P.O. Box 2108
Santa Fe Springs, CA 90620

*TC wastes are exempt
daily for non-hazardous
facilities.*

Dear Ms. Christian:

REVISED PART A APPLICATION FOR TOXICITY CHARACTERISTIC WASTE, FACILITY EPA
ID# CAD008383291

This letter will confirm your telephone conversation with Andy Bajwa of this
office on April 1, 1991.

We received your Part A Permit Application on March 17, 1991, regarding the
notification requirement of newly identified Toxicity Characteristic (TC)
waste. We did a detailed review of your Part A permit application. During
the telephone conversation on April 1, you told Mr. Bajwa that your submittal
on March 17 was in error and no TC wastes are handled by your facility. This
Department has come to the conclusion that your facility is not affected by
the TC Regulations and does not require any modification of your existing
Interim Status Document (ISD).

If you have any questions concerning your application, you may contact
Andy Bajwa of my staff at (818) 567-3122.

Sincerely,

for [Signature]

Scott Simpson, Chief
Facility Management Branch

cc: James Breitlow
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Paul Blais
Hazardous Waste Management Branch
Toxic Substances Control Program
714/744 P Street
P.O. Box 942732
Sacramento, CA 94234-7320